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1 2 3 4 5 6 7 8 9 10 11 12	Page 1 UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF FLORIDA WEST PALM BEACH DIVISION IN RE: CASE NO. 18-19441-EPK Chapter 11 160 ROYAL PALM, LLC, Debtor. Shraiberg Landau & Page 2385 NW Executive Center Drive	1 2 3 4 5 6 7 8 9	Page 3 EXHIBITS MARKED FOR IDENTIFICATION Exhibit Number 1 7 Composite Exhibit Number 2 10 Exhibit Number 3 26 Exhibit Number 4 29 Exhibit Number 5 36 Exhibit Number 6 37 Exhibit Number 7 39 Composite Exhibit Number 8 40 Exhibit Number 9 46 Exhibit Number 10 85 Exhibit Number 11 126 Exhibit Number 12 130 Composite Exhibit Number 13 142 Composite Exhibit Number 14 146 Exhibit Number 15 140
13 14 15 16 17 18 19 20 21 22 23 24 25	Suite 300 Boca Raton, Fl 33431 November 26, 2018 9:15 a.m. to 4:45 p.m. DEPOSITION OF MARIA MATTHEWS Taken pursuant to Notice, On behalf of the Debtor.	10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	Exhibit Number 15 199 Exhibit Number 16 201 Exhibit Number 17 207 Exhibit Number 18 210 *** All Exhibits were retained by Mr. Landau.
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	APPEARANCES: SHRAIBERG LANDAU & PAGE, by PHILIP J. LANDAU, ESQUIRE On behalf of the Debtor SALAZAR LAW, by LUIS SALAZAR, ESQUIRE On behalf of KK-PB Financial, LLC GEORGE GESTEN McDONALD, by DAVID J. GEORGE, ESQUIRE On behalf of the EB-5 Investors KAMMERER MARIANI, by JOHN F. MARIANI, ESQUIRE On behalf of Maria Matthews ALSO PRESENT: GLENN STRAUB 1-N-D-E-X WITNESS DIRECT CROSS REDIRECT RE-CROSS MARIA MATTHEWS By Mr. Landau 4 258 By Mr. George 120 By Mr. Salazar 260	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Mia Matthews. Q. Okay, and what is your address? A. 101 Casa Bendita, Palm Beach, Florida 33480. Q. And how long have you been residing there? A. Over ten years. I'm not sure of the exact number of years. Q. And who resides at that home with you? A. Robert Matthews. Q. And do you have any children? A. Yes. Q. What are their names? A. Miranda and Bianca.
22 23 24 25	By Mr. Salazar 260	23 24 25	Q. And how old are they?A. Bianca is 18, Miranda is 19.Q. Okay, and do they both reside at that home

	Page 5		Page 7
1	with you?	1	A. Yes.
2	A. No.	2	Q. How do you know Mr. Straub?
3	Q. Where do they live?	3	A. On advice of counsel, I'm exercising my
4	A. Miranda is at college and working in	4	rights under the Fifth Amendment and decline to answer the
5	Connecticut currently. Bianca is living in Albany,	5	question.
6	California.	6	Q. When was the first time that you met
7	Q. And where is Miranda in school in	7	Mr. Straub?
8	Connecticut?	8	A. On advice of counsel, I'm exercising my
9	A. She's in school at Dartmouth College in	9	rights under the Fifth Amendment and decline to answer the
10	New Hampshire.	10	question.
11	Q. Okay.	11	MR. LANDAU: Let's go ahead and mark that as
12	A. She is currently on leave as a preschool	12	Exhibit 1.
13	teacher in Connecticut.	13	(Thereupon, Exhibit Number 1 was marked for
14	Q. Okay, and what year did she get through at	14	Identification.)
15	Dartmouth?	15	MR. SALAZAR: Pass it down?
16	A. She's a sophomore.	16	MR. LANDAU: Sure.
17	Q. Okay. So she attended there last year?	17	MR. STRAUB: If my attorney is dressed
18	A. Yes.	18	better than I do, I get mad.
19	Q. Okay, and who paid for her to attend there?	19	BY MR. LANDAU:
20	A. On advice of counsel, I'm exercising my	20	Q. Ms. Matthews, Exhibit 1 is an e-mail from
21	rights under the Fifth Amendment and decline to answer the		yourself to Mr. Straub and Craig Galle dated June 27,
22	question.	22	2002. Do you see that?
23	Q. Okay. Isn't it true that Glenn Straub	23	MR. SALAZAR: Object to form.
24	helped pay for her to attend college in Dartmouth?	24	THE WITNESS: On advice of counsel, I'm
25	MR. SALAZAR: Object to the form of the	25	exercising my rights under the Fifth Amendment and decline
	Page 6		Page 8
1	Page 6 question, object to relevancy.	1	Page 8 to answer the question.
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	Page 9		Page 11
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1	THE WITNESS: On advice of counsel, I'm	1	MR. LANDAU: There have been many
2	exercising my rights under the Fifth Amendment and decline	2	productions, it could have been from the Bob Matthews'
3	to answer the question.	3	production.
4	BY MR. LANDAU:	4	MR. MARIANI: No, understood. Do you know
5 6	Q. Ms. Matthews, isn't it true that you were having a romantic relationship with Mr. Straub?	5 6	who Bates stamped them, that's my question? MR. LANDAU: I do not. It was not it was
7	MR. SALAZAR: Object to form, object to	7	not myself.
8	relevancy, and object to this profound lack of any kind of	8	MR. MARIANI: Okay. Fair enough, but can
9	professionalism in going into these questions.	9	you put on the record the Bates stamp numbers
10	BY MR. LANDAU:	10	MR. LANDAU: Yeah, that I think will be the
11	Q. You can answer.	11	easiest way to go.
12	A. On advice of counsel, I'm exercising my	12	MR. MARIANI: of the composite exhibit?
13	rights under the Fifth Amendment and decline to answer the	13	MR. LANDAU: Right. So let me
14	question.	14	MR. MARIANI: Let him identify the Bates
15	Q. In fact, isn't it true that you were having	15	stamp numbers.
16	a romantic relationship with Mr. Straub at the time this	16	MR. LANDAU: Yeah, let me just see if
17	e-mail was sent?	17	they're consecutive.
18	MR. SALAZAR: Same objection.	18	So, for the record, the documents that we
19	THE WITNESS: On advice of counsel, I'm	19	are going through, Composite 2, are Bates numbered 195
20	exercising my rights under the Fifth Amendment and decline	20	through 224.
21	to answer the question.	21	MR. MARIANI: I would ask you to indicate
22	MR. MARIANI: Excuse me, is this my copy?	22	you don't know the source of the Bates numbering.
23	MR. LANDAU: Yeah,	23	MR. LANDAU: Yeah, at this time I can't
24	MR. MARIANI: Okay.	24	I'm not sure which production this arises from.
25	MR. LANDAU: Oh, no, no, no. That's the	25	MR. MARIANI: Thank you.
	Page 10		Page 12
1	original. Did I not give you one?	1	MR. SALAZAR: For the record, whatever the
2	MR. MARIANI: No.	2	production is, we'd like a full copy, please.
3	MR. LANDAU: I apologize.	3	MR. LANDAU: You have a full copy.
4	MR. MARIANI: Thank you. Okay. Where do	4	MR. SALAZAR: Are you sure?
5	you want to keep the originals?	5	MR. LANDAU: Absolutely.
6	MR. LANDAU: Just in front of her.	6	MR. SALAZAR: How do you know that if you
7	MR. MARIANI: I'll put them right here.	7	don't know which production
8	MR. LANDAU: Yeah, that's perfect.	8	MR. LANDAU: Well, I know I've given you
9	MR. SALAZAR: That was 1?	9	everything that I have.
10	MR. LANDAU: Yes. Let's go ahead and mark	10	MR. SALAZAR: We should check, I am not sure
11 12	this as Composite 2.	11 12	that's the case.
12	(Thereupon, Composite Exhibit Number 2 was	13	MR. LANDAU: Yeah, positive. BY MR. LANDAU:
	marked for Identification		
13	marked for Identification.) MR MARIANI: Thank you. Let me take a look		
13 14	MR. MARIANI: Thank you. Let me take a look	14	Q. Okay. So we'll start with the e-mail that's
13 14 15	MR. MARIANI: Thank you. Let me take a look at it, please.	14 15	Q. Okay. So we'll start with the e-mail that's at Bates Number 195. Do you see that?
13 14 15 16	MR. MARIANI: Thank you. Let me take a look at it, please. THE WITNESS: It's the same as yours?	14 15 16	Q. Okay. So we'll start with the e-mail that's at Bates Number 195. Do you see that? A. Yes.
13 14 15 16 17	MR. MARIANI: Thank you. Let me take a look at it, please. THE WITNESS: It's the same as yours? MR. MARIANI: Can I ask about the Bates	14 15 16 17	Q. Okay. So we'll start with the e-mail that's at Bates Number 195. Do you see that? A. Yes. Q. Okay.
13 14 15 16 17 18	MR. MARIANI: Thank you. Let me take a look at it, please. THE WITNESS: It's the same as yours? MR. MARIANI: Can I ask about the Bates numbers? What Bates numbers are those?	14 15 16 17 18	Q. Okay. So we'll start with the e-mail that's at Bates Number 195. Do you see that? A. Yes. Q. Okay. A. Oh, I mean oh, okay, whatever.
13 14 15 16 17 18 19	MR. MARIANI: Thank you. Let me take a look at it, please. THE WITNESS: It's the same as yours? MR. MARIANI: Can I ask about the Bates numbers? What Bates numbers are those? MR. LANDAU: I believe these were produced	14 15 16 17 18 19	Q. Okay. So we'll start with the e-mail that's at Bates Number 195. Do you see that? A. Yes. Q. Okay. A. Oh, I mean oh, okay, whatever. Q. And the docket that's at Bates 195 well,
13 14 15 16 17 18 19 20	MR. MARIANI: Thank you. Let me take a look at it, please. THE WITNESS: It's the same as yours? MR. MARIANI: Can I ask about the Bates numbers? What Bates numbers are those? MR. LANDAU: I believe these were produced in documents that we requested from that were produced	14 15 16 17 18 19 20	Q. Okay. So we'll start with the e-mail that's at Bates Number 195. Do you see that? A. Yes. Q. Okay. A. Oh, I mean oh, okay, whatever. Q. And the docket that's at Bates 195 well, have you seen this e-mail before?
13 14 15 16 17 18 19 20 21	MR. MARIANI: Thank you. Let me take a look at it, please. THE WITNESS: It's the same as yours? MR. MARIANI: Can I ask about the Bates numbers? What Bates numbers are those? MR. LANDAU: I believe these were produced in documents that we requested from that were produced to us from Craig Galle.	14 15 16 17 18 19 20 21	Q. Okay. So we'll start with the e-mail that's at Bates Number 195. Do you see that? A. Yes. Q. Okay. A. Oh, I mean oh, okay, whatever. Q. And the docket that's at Bates 195 well, have you seen this e-mail before? A. On advice of counsel, I'm exercising my
13 14 15 16 17 18 19 20	MR. MARIANI: Thank you. Let me take a look at it, please. THE WITNESS: It's the same as yours? MR. MARIANI: Can I ask about the Bates numbers? What Bates numbers are those? MR. LANDAU: I believe these were produced in documents that we requested from that were produced	14 15 16 17 18 19 20	Q. Okay. So we'll start with the e-mail that's at Bates Number 195. Do you see that? A. Yes. Q. Okay. A. Oh, I mean oh, okay, whatever. Q. And the docket that's at Bates 195 well, have you seen this e-mail before?
13 14 15 16 17 18 19 20 21 22	MR. MARIANI: Thank you. Let me take a look at it, please. THE WITNESS: It's the same as yours? MR. MARIANI: Can I ask about the Bates numbers? What Bates numbers are those? MR. LANDAU: I believe these were produced in documents that we requested from that were produced to us from Craig Galle. MR. SALAZAR: I don't think that's correct.	14 15 16 17 18 19 20 21 22	Q. Okay. So we'll start with the e-mail that's at Bates Number 195. Do you see that? A. Yes. Q. Okay. A. Oh, I mean oh, okay, whatever. Q. And the docket that's at Bates 195 well, have you seen this e-mail before? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the
13 14 15 16 17 18 19 20 21 22 23	MR. MARIANI: Thank you. Let me take a look at it, please. THE WITNESS: It's the same as yours? MR. MARIANI: Can I ask about the Bates numbers? What Bates numbers are those? MR. LANDAU: I believe these were produced in documents that we requested from that were produced to us from Craig Galle. MR. SALAZAR: I don't think that's correct. MR. LANDAU: No?	14 15 16 17 18 19 20 21 22 23	Q. Okay. So we'll start with the e-mail that's at Bates Number 195. Do you see that? A. Yes. Q. Okay. A. Oh, I mean oh, okay, whatever. Q. And the docket that's at Bates 195 well, have you seen this e-mail before? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.

	D. 12		D. 15
	Page 13		Page 15
1	make on your behalf?	1	delinquent. Do you see that?
2	MR. SALAZAR: Object to the form of the	2	MR. SALAZAR: Object to the form of the
3	question and relevancy.	3	question and relevancy.
4	THE WITNESS: On advice of counsel, I'm	4	THE WITNESS: On advice of counsel, I'm
5	exercising my rights under the Fifth Amendment and decline to answer the question.	5	exercising my rights under the Fifth Amendment and decline
6 7	BY MR. LANDAU:	6 7	to answer the question. BY MR. LANDAU:
8	Q. If we flip to the next page, 196, that's the	8	Q. And, in fact, going back to Bates Number
9	same exhibit as Exhibit 1. Do you see that?	9	196, this is the reason you are seeking a loan from
10	A. On advice of counsel, I'm exercising my	10	Mr. Straub; correct?
11	rights under the Fifth Amendment and decline to answer the	11	MR. SALAZAR: Same objection.
12	question.	12	THE WITNESS: On advice of counsel, I'm
13	Q. Okay, and in that e-mail you refer to a	13	exercising my rights under the Fifth Amendment and decline
14	letter from an insurance adjuster. The next few pages,	14	to answer the question.
15	190 Bates Number 197 and 198, are, in fact, that letter	15	BY MR. LANDAU:
16	that this e-mail refers to from the insurance adjuster;	16	Q. And if you'd flip to Bates Number 202, this
17	correct?	17	is an e-mail to Craig Galle from Craig Galle to
18	MR. SALAZAR: Object to form and relevancy.	18	Keith Mahler, I don't know if I'm pronouncing that right,
19	THE WITNESS: On advice of counsel, I'm	19	and you and your husband, Bob Matthews, are copied on
20	exercising my rights under the Fifth Amendment and decline	20	this. Do you see that?
21	to answer that question.	21	MR. SALAZAR: Object to the form and
22	BY MR. LANDAU:	22	relevancy.
23	Q. And that letter, the letter from	23	THE WITNESS: On advice of counsel, I'm
24	Giordano Associates regarding the insurance claim, that's	24	exercising my rights under the Fifth Amendment and decline
25	the collateral that you're seeking to pledge to Mr. Straub	25	to answer the question.
	Page 14		Page 16
1	as referenced in the e-mail at Bates Number 196; correct?	1	BY MR. LANDAU:
2	MR. SALAZAR: Object to form and relevancy.	2	Q. Have you seen this document before?
3	THE WITNESS: On advice of counsel, I'm	3	A. On advice of counsel, I'm exercising my
4	exercising my rights under the Fifth Amendment and decline	4	rights under the Fifth Amendment and decline to answer the
5	to answer the question.	5	question.
6	BY MR. LANDAU:	6	Q. And through this e-mail, Mr. Galle is
7	Q. I'd ask you to flip to the next page, Bates	7	sending Mr. Mahler an assignment of second mortgage
8	Number 199 and 200, is a letter from the law firm of	8	relating to the Nantucket home; correct?
9	Stanton & Davis to your husband.	9	MR. SALAZAR: Same objection.
10	Have you seen this letter before?	10	THE WITNESS: On advice of counsel, I'm
11	MR. SALAZAR: Same objection, lack of	11	exercising my rights under the Fifth Amendment and decline
12	foundation.	12	to answer the question.
13	THE WITNESS: On advice of counsel, I'm	13	BY MR. LANDAU:
14	exercising my rights under the Fifth Amendment and decline to answer the question.	14	Q. And, in fact, Mr. Straub, through one of his
15 16	MR. LANDAU: I apologize, go off the record	15 16	companies, acquired that second mortgage; correct? MR. SALAZAR: Same objection.
17	one second.	17	THE WITNESS: On advice of counsel, I'm
18	(Discussion off the record.)	18	exercising my rights under the Fifth Amendment and decline
19	MR. LANDAU: Sorry about that, back on the	19	to answer the question.
20	record.	20	BY MR. LANDAU:
_~			
21	BY MR. LANDAU:	21	Q. If we flip to the flext page, bates Nulliber
21 22		21 22	Q. If we flip to the next page, Bates Number 203, can you tell me what this document is?
	BY MR. LANDAU: Q. Ms. Matthews, we were discussing this letter from Stanton & Davis to your husband. In this letter		203, can you tell me what this document is? MR. MARIANI: Which page number, Counsel?
22	BY MR. LANDAU: Q. Ms. Matthews, we were discussing this letter from Stanton & Davis to your husband. In this letter through this letter, this law firm for the bank that holds	22 23 24	203, can you tell me what this document is? MR. MARIANI: Which page number, Counsel? MR. LANDAU: 203, Bates Number 203.
22 23	BY MR. LANDAU: Q. Ms. Matthews, we were discussing this letter from Stanton & Davis to your husband. In this letter	22 23	203, can you tell me what this document is? MR. MARIANI: Which page number, Counsel?

	Page 17		Page 19
1	·	1	
1	202, is that fair?	1 2	through them one by one, a loan agreement; yes? MR. SALAZAR: Object to the form of the
2 3	MR. SALAZAR: I'm sorry, what? MR. LANDAU: No, I thought we just discussed	3	question.
4	202.	4	THE WITNESS: On advice of counsel, I'm
5	MR. GEORGE: He just asked questions about	5	exercising my rights under the Fifth Amendment and decline
6	202.	6	to answer the question.
7	MR. LANDAU: Yeah.	7	BY MR. LANDAU:
8	MR. MARIANI: Okay. Thank you.	8	Q. Number two is a promissory note with balloon
9	MR. LANDAU: I apologize. For the record,	9	payment.
10	the prior questions, if I didn't state it already, were	10	MR. SALAZAR: Objection to form and
11	related to Bates Number 202.	11	relevancy.
12	MR. SALAZAR: I renew the objection.	12	THE WITNESS: On advice of counsel, I'm
13	BY MR. LANDAU:	13	exercising my rights under the Fifth Amendment and decline
14	Q. Okay. So back to Bates Number 203, have you	14	to answer the question.
15	seen this document before?	15	BY MR. LANDAU:
16	A. On advice of counsel, I'm exercising my	16	Q. Number three is an assignment of insurance
17	rights under the Fifth Amendment and decline to answer the	17	proceeds.
18	question.	18	MR. SALAZAR: Same objection.
19	Q. In fact, it's an e-mail from Craig Galle to	19	THE WITNESS: On advice of counsel, I'm
20	yourself and Bob Matthews; correct?	20	exercising my rights under the Fifth Amendment and decline
21	MR. SALAZAR: Object to the form of the	21	to answer the question.
22	question and relevancy.	22	BY MR. LANDAU:
23	THE WITNESS: On advice of counsel, I'm	23	Q. Number four is a UCC-1 financing statement.
24	exercising my rights under the Fifth Amendment and decline		MR. SALAZAR: Same objection.
25	to answer the question.	25	THE WITNESS: On advice of counsel, I'm
	Page 18		Page 20
1	BY MR. LANDAU:	1	exercising my rights under the Fifth Amendment and decline
2	Q. The e-mail address that's listed here for	2	to answer the question.
3	yourself, miamatthews@mac, m-a-c, .com, is that, in fact,	3	BY MR. LANDAU:
4	your e-mail address?	4	Q. Number five is an assignment of second
5	A. On advice of counsel, I'm exercising my	5	mortgage.
6	rights under the Fifth Amendment and decline to answer the	6	MR. SALAZAR: Same objection.
7	question.	7	BY MR. LANDAU:
8	Q. You can't confirm your e-mail address?	8	Q. Correct?
9	A. On advice of counsel, I'm exercising my	9	A. On advice of counsel, I'm exercising my
10	rights under the Fifth Amendment and decline to answer the		rights under the Fifth Amendment and decline to answer the
11	question.	11	question.
12 13	Q. And through this e-mail, what is it that Mr. Galle is asking you to review?	12 13	Q. And then Number 6 is an assignment of loan documents and transfer of debt and liens; correct?
14	A. On advice of counsel, I'm exercising my	14	MR. SALAZAR: Same objection.
14	rights under the Fifth Amendment and decline to answer the		THE WITNESS: On advice of counsel, I'm
15		10	· · · · · · · · · · · · · · · · · · ·
15 16		16	exercising my rights under the Fifth Amendment and decline
16	question.	16 17	exercising my rights under the Fifth Amendment and decline to answer the question.
16 17	question. MR. SALAZAR: Pardon me, same objection to		to answer the question.
16	question. MR. SALAZAR: Pardon me, same objection to that question.	17	
16 17 18	question. MR. SALAZAR: Pardon me, same objection to	17 18	to answer the question. BY MR. LANDAU:
16 17 18 19	question. MR. SALAZAR: Pardon me, same objection to that question. MR. LANDAU: What what would be wrong	17 18 19	to answer the question. BY MR. LANDAU: Q. Bates Number 204 and 205, have you seen this
16 17 18 19 20	question. MR. SALAZAR: Pardon me, same objection to that question. MR. LANDAU: What what would be wrong with the form of the question? MR. SALAZAR: I think it lacks a predicate in several different ways.	17 18 19 20	to answer the question. BY MR. LANDAU: Q. Bates Number 204 and 205, have you seen this document before? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the
16 17 18 19 20 21 22 23	question. MR. SALAZAR: Pardon me, same objection to that question. MR. LANDAU: What what would be wrong with the form of the question? MR. SALAZAR: I think it lacks a predicate in several different ways. BY MR. LANDAU:	17 18 19 20 21 22 23	to answer the question. BY MR. LANDAU: Q. Bates Number 204 and 205, have you seen this document before? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.
16 17 18 19 20 21 22	question. MR. SALAZAR: Pardon me, same objection to that question. MR. LANDAU: What what would be wrong with the form of the question? MR. SALAZAR: I think it lacks a predicate in several different ways.	17 18 19 20 21 22	to answer the question. BY MR. LANDAU: Q. Bates Number 204 and 205, have you seen this document before? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the

	Page 21		Page 23
1	relevancy.	1	to answer the question.
2	THE WITNESS: On advice of counsel, I'm	2	BY MR. LANDAU:
3	exercising my rights under the Fifth Amendment and decline	3	Q. I'd ask you to turn to Bates Number 220. At
4	to answer the question.	4	Bates Number 220 is the signature page for the assignment
5	BY MR. LANDAU:	5	of insurance proceeds, which begins at Bates Number 219.
6	Q. Okay. The next document, let me cover this	6	Is that your signature on Bates Number 220?
7	as quickly as possible. Okay. So Bates Numbers 206	7	MR. SALAZAR: Object to the form and
8	through 223, all relate to this e-mail at Bates Number	8	relevancy.
9	206.	9	THE WITNESS: On advice of counsel, I'm
10	Have you seen these documents before?	10	exercising my rights under the Fifth Amendment and decline
11	MR. SALAZAR: Object to form and relevancy.	11	to answer the question.
12	THE WITNESS: On advice of counsel, I'm	12	BY MR. LANDAU:
13	exercising my rights under the Fifth Amendment and decline	13	Q. Did you sign this document?
14	to answer the question.	14	MR. SALAZAR: Same objection.
15	BY MR. LANDAU:	15	THE WITNESS: On advice of counsel, I'm
16	Q. In fact, the e-mail is addressed to you and	16	exercising my rights under the Fifth Amendment and decline
17	Bob Matthews; correct?	17	to answer the question.
18	MR. SALAZAR: Object to form and relevancy.	18	BY MR. LANDAU:
19	THE WITNESS: On advice of counsel, I'm	19	Q. I ask you to flip to the next page, Bates
20	exercising my rights under the Fifth Amendment and decline	20	Number 221. This is a UCC financing statement.
21	to answer the question.	21	Have you seen this document before?
22	BY MR. LANDAU:	22	MR. SALAZAR: Same objection.
23	Q. And they're asking you to execute various	23	THE WITNESS: On advice of counsel, I'm
24	loan documents between Bob Matthews and Equipment Leasing	24	exercising my rights under the Fifth Amendment and decline
25	International, LLC; correct?	25	to answer the question.
	Page 22		Page 24
1	MR. SALAZAR: Object to form and relevancy.	1	BY MR. LANDAU:
2	THE WITNESS: On advice of counsel, I'm	2	Q. Did you sign this document, Ms. Matthews?
3	exercising my rights under the Fifth Amendment and decline	3	MR. SALAZAR: Same objection.
4	to answer the question.	4	THE WITNESS: On advice of counsel, I'm
5	BY MR. LANDAU:	5	exercising my rights under the Fifth Amendment and decline
6	Q. In fact, if you'd turn to 219, which is the	6	to answer the question.
7	assignment of insurance proceeds, that document also	7	BY MR. LANDAU:
8	includes you as an assignor; correct?	8	Q. The signature towards the bottom where it
9	MR. SALAZAR: Object to the form of the	9	says Mia Matthews, is that your signature?
10	question and relevancy.	10	MR. SALAZAR: Same objection.
11	THE WITNESS: On advice of counsel, I'm	11	THE WITNESS: On advice of counsel, I'm
12	exercising my rights under the Fifth Amendment and decline		exercising my rights under the Fifth Amendment and decline
13	to answer the question.	13	to answer the question.
14	BY MR. LANDAU:	14	BY MR. LANDAU:
15	Q. Do you recall signing these documents?	15	Q. Ms. Matthews, did you sign this document at
16	MR. SALAZAR: Object to form and relevancy.	16	Bates Number 221?
17	THE WITNESS: On advice of counsel, I'm	17	MR. SALAZAR: Same objection, and asked and
18	exercising my rights under the Fifth Amendment and decline		answered.
19	to answer the question.	19 20	THE WITNESS: On advice of counsel, I'm
α	DV MD I ANDAH.	///	exercising my rights under the Fifth Amendment and decline
20	BY MR. LANDAU:		
21	Q. In fact, you and your husband did execute	21	to answer the question.
21 22	Q. In fact, you and your husband did execute these documents; correct?	21 22	to answer the question. BY MR. LANDAU:
21 22 23	Q. In fact, you and your husband did execute these documents; correct? MR. SALAZAR: Object to form and relevancy.	21 22 23	to answer the question. BY MR. LANDAU: Q. Mr. Straub would not have made this loan
21 22	Q. In fact, you and your husband did execute these documents; correct?	21 22 23 24	to answer the question. BY MR. LANDAU:

relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. What is your understanding, Ms. Matthews, of the purpose of this tetter? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. THE WITNESS: On advice of counsel, I'm to answer the question. THE WITNESS:		D 25		D 27
the purpose of this letter? the purpose of this letter? to unswer the question. Specifically, this assignment of insurance proceeds at Bates 219 to 220, Mr. Straub and Equipment Leasing International, LLC, would not have provided the loan if to answer the question. THE WITNESS: On advice of counsel, I'm to answer				ŭ
secretising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: O. Specifically, this assignment of insurance proceeds at Bates 219 to 220, Mr. Straub and Equipment Leasing International, LLC, would not have made this loan if you did not sign this document; correct? MR. SALAZAR: Same objection. BY MR. LANDAU: MR. SALAZAR: Sume objection. BY MR. LANDAU: MR. SALAZAR: Straub, through his command the late of answer the question. BY MR. LANDAU: MR. SALAZAR: Straub, through his command the late of answer the question. BY MR. LANDAU: MR. SALAZAR: Object on form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. SALAZAR: Same objection. MR. SAL				
4 THE WITNIESS: On advice of counsel, I'm 5 BY MR. LANDAU: 6 Q. Specifically, this assignment of insurance 7 proceeds at Bates 219 to 220. Mr. Strauth and Equipment 1 Leasing International, LLC, would not have provided the loan if 10 MR. SALAZAR: Same objection. 11 THE WITNIESS: On advice of counsel, I'm 22 exercising my rights under the Fifth Amendment and decline 13 to answer the question. 14 BY MR. LANDAU: 15 Q. And similarly, the document at 221, the UCC 16 financing statement, Mr. Straub and Equipment Leasing 1 International, LLC, would not have provided the loan if 18 you did not sign this document; correct? 19 you did not sign this document; correct? 20 THE WITNESS: On advice of counsel, I'm 21 exercising my rights under the Fifth Amendment, and decline 22 answer the question. 23 MR. SALAZAR: Same objection. 24 THE WITNESS: On advice of counsel, I'm 25 WMR. SALAZAR: Sume objection. 26 MR. SALAZAR: Sume objection. 27 THE WITNESS: On advice of counsel, I'm 28 WMR. LANDAU: 29 Q. Go ahead and mark this as 3. 3 MR. MARIANI: Here, I'll take care of these, 4 don't wary about them. 4 MR. LANDAU: Yep. 5 Go ahead and mark this as 3. 5 MR. MARIANI: Yep, 6 Go ahead and mark this as 3. 6 MR. MARIANI: Yep, 7 MR. MARIANI: Yes, thank you. 4 (Thereupon, Exhibit Number 3 was marked for 10 Identification.) 4 MR. LANDAU: 5 WMR. LANDAU: 6 MR. LANDAU: 7 MR. MARIANI: Yes, thank you. 8 BY MR. LANDAU: 9 Q. Okay, Ms. Matthews, the document that I 1 have - that weve labelled as Exhibit Number 3, have you 11 seen this document before? 12 A. On advice of counsel, I'm exercising my 17 rights under the Fifth Amendment and decline to answer the 18 question. 9 Q. Who is this letter addressed to you and 19 your husband; correct? 10 Q. The letter is, in fact, addressed to you and 20 your husband; correct? 21 MR. SALAZAR: Same objection, and asked and 22 worrelated the Fifth Amendment and decline to answer the 23 question. 9 Q. The letter is, in fact, addressed to you and 24 your husband; correct? 25 MR. SALAZAR: Object to form and relevan		·		· ·
5 BY MR. LANDAU: 6 Q. Specifically, this assignment of insurance proceeds at Bates 219 to 220, Mr. Straub and Equipment 8 Leasing International, LLC, would not have made this loan if you did not sign this document; correct? 10 MR. SALAZAR: Same objection. 11 THE WITNESS: On advice of counsel, I'm 12 exercising my rights under the Fifth Amendment and decline to answer the question. 12 BY MR. LANDAU: 13 THE WITNESS: On advice of counsel, I'm 14 Every and the state of the secretary of the secretar	3		_	
6 Q. Specifically, this assignment of insurance 7 proceeds at Bates 219 to 220, Mr. Straub and Equipment 8 Leasing International, LLC, would not have made this loan 9 if you did not sign this document; correct? 10 Mr. SALAZAR: Smae objection. 11 THE WITINESS: On advice of counsel, I'm 12 cextricising my rights under the Fifth Amendment and decline 13 to answer the question. 14 BY MR. LANDAU: 15 Q. And similarly, the document at 221, the UCC 16 financing statement, Mr. Straub and Equipment Leasing 16 International, LLC, would not have provided the loan if 18 you did not sign this document; correct? 19 MR. SALAZAR: Same objection. 19 Out did not sign this document; correct? 20 exercising my rights under the Fifth Amendment, decline to 21 answer the question. 22 answer the question. 23 MR. MARIANI: Here, I'll take care of these, 24 don't worry about them. 25 MR. SALAZAR: That was 2; right? 26 Go ahead and mark this as 3. 3 MR. MARIANI: Here, I'll take care of these, 26 don't worry about them. 27 MR. SALAZAR: That was 2; right? 28 MR. ANARIANI: Thank you. 29 (Thereupon, Exhibit Number 3 was marked for 29 Identification.) 30 MR. MARIANI: Yep, 31 Identification.) 40 MR. LANDAU: 41 MY MR. LANDAU: 42 MR. SALAZAR: Object or clevancy. 43 MR. MARIANI: Thank you. 44 (Thereupon, Exhibit Number 3 was marked for 45 MR. SALAZAR: Same objection. 46 MR. LANDAU: 47 MR. SALAZAR: Same objection. 48 MR. MARIANI: Thank you. 49 MR. LANDAU: 50 MR. SALAZAR: Object or clevancy. 51 MR. SALAZAR: Same objection. 52 MR. MARIANI: Thank you. 53 MR. MARIANI: Thank you. 64 MR. SALAZAR: Same objection. 65 MR. LANDAU: 66 MR. LANDAU: 77 MR. SALAZAR: Same objection. 78 MR. SALAZAR: Object or clevancy. 79 MR. SALAZAR: Same objection. 80 MR. MARIANI: Thank you. 81 MR. MARIANI: Thank you. 82 MR. MARIANI: Thank you. 83 MR. MARIANI: Thank you. 84 MR. MARIANI: There print was a stream of the print was	4	•	-	·
Proceeds at Bates 219 to 220, Mr. Straub and Equipment	5		5	
s Leasing International, LLC, would not have made this loan if you did not sign this document; correct? MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm company requipment Leasing International — well, let me ask you that. To your knowledge, what is Equipment Leasing International, LLC? MR. SALAZAR: Objection to form and relevancy. THE WITNESS: On advice of counsel, I'm company rights under the Fifth Amendment and decline to answer the question. RYMR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm care of these, don't wormy about them. MR. SALAZAR: That was 2; right? Tage 26 MR. SALAZAR: That was 2; right? The WITNESS: On advice of counsel, I'm care of these, don't wormy about them. MR. LANDAU: Yep. Go ahead and mark this as 3. MR. MARIANI: Thank you. MR. MARIANI: Thank you. Thereupon, Exhibit Number 3 was marked for MR. LANDAU: MR. SALAZAR: Same objection. The WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. There with the counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. There with the counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. There with the counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. There with the Fifth Amendment and decline to answer the question. There with the counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. There with the with the Fifth Amendment and decline to answer the question. There with the with the fifth Amendment and decline to answer the question. There with the with the with the fifth Amendment and decline to answer the question. There with the print the with the with	6		_	-
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	Page 29		Page 31
1	BY MR. LANDAU:	1	to answer the question.
2	Q. When was the last time you've spoken to	2	BY MR. LANDAU:
3	Mr. Straub?	3	Q. And in this complaint he's suing you for
4	A. On advice of counsel, I'm exercising my	4	over \$775,000; correct?
5	rights under the Fifth Amendment and decline to answer the	5	A. On advice of counsel, I'm exercising my
6	question.	6	rights under the Fifth Amendment and decline to answer the
7	Q. Okay. Well, you provided us with through	7	question.
8	discovery, copies of text messages between yourself and	8	MR. SALAZAR: Object to the form and
9	Mr. Straub. Do you recall that?	9	relevancy of that question.
10	A. On advice of counsel, I'm exercising my	10	BY MR. LANDAU:
11	rights under the Fifth Amendment and decline to answer the		Q. And ultimately Equipment Leasing
12	question.	12	International, LLC obtains a judgment against you;
13	Q. Okay. Well, we'll get back to those.	13	correct?
14	Referring back to this letter at Bates Number 296, Equipment Leasing International, LLC	14	MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm
15	subsequently sued you; correct?	15 16	exercising my rights under the Fifth Amendment and decline
16 17	A. On advice of counsel, I'm exercising my	17	to answer the question.
18	rights under the Fifth Amendment and decline to answer the		BY MR. LANDAU:
19	question.	19	Q. In this packet, I'd ask you to turn to
20	MR. SALAZAR: Objection as to relevancy.	20	Exhibit E, which is Bates Stamped Number 333.
21	MR. LANDAU: What are we up to, 4?	21	Can you tell us what this letter is?
22	THE COURT REPORTER: 4.	22	A. On advice of
23	(Thereupon, Exhibit Number 4 was marked for	23	MR. SALAZAR: Objection, relevancy. Sorry.
24	Identification.)	24	THE WITNESS: On advice of counsel, I'm
25	BY MR. LANDAU:	25	exercising my rights under the Fifth Amendment and decline
	Page 30		Page 32
1	Q. The document that's been marked as	1	
2	Exhibit 4, have you seen this document before?	1 2	to answer the question. BY MR. LANDAU:
3	A. On advice of counsel, I'm exercising my	3	Q. Okay. In fact, it's a letter from yourself
4	rights under the Fifth Amendment and decline to answer the	4	to Chartis Insurance; correct?
5	question.		MR. SALAZAR: Same objection.
6	Q. In fact, the document at that's been		
		5 6	
7	-	6	THE WITNESS: On advice of counsel, I'm
7	marked as Exhibit 4, is a complaint dated October 15,	6 7	THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline
7 8 9	marked as Exhibit 4, is a complaint dated October 15, 2010, and the plaintiff is Equipment Leasing	6	THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.
7 8	marked as Exhibit 4, is a complaint dated October 15, 2010, and the plaintiff is Equipment Leasing International, LLC vs. Mia Matthews; Robert Matthews;	6 7 8 9	THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU:
7 8 9	marked as Exhibit 4, is a complaint dated October 15, 2010, and the plaintiff is Equipment Leasing	6 7 8 9	THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.
7 8 9 10	marked as Exhibit 4, is a complaint dated October 15, 2010, and the plaintiff is Equipment Leasing International, LLC vs. Mia Matthews; Robert Matthews; Chartis Property Casualty Company; Deutsche Bank, AG; and	6 7 8 9 10	THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. At the bottom of this document, is that your
7 8 9 10 11	marked as Exhibit 4, is a complaint dated October 15, 2010, and the plaintiff is Equipment Leasing International, LLC vs. Mia Matthews; Robert Matthews; Chartis Property Casualty Company; Deutsche Bank, AG; and Keith Mahler; is that correct?	6 7 8 9 10 11	THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. At the bottom of this document, is that your signature, Ms. Matthews?
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	Page 33		Page 35
1	Washington, Connecticut, was that your address at the time	1	question.
2	of sending this letter?	2	Q. The document appears to be a check to
3	MR. SALAZAR: Objection to form and	3	Equipment Leasing International, LLC/Glenn Straub. Do you
4	relevancy.	4	see that?
5	THE WITNESS: On advice of counsel, I'm	5	A. On advice of counsel, I'm exercising my
6	exercising my rights under the Fifth Amendment and decline	_	rights under the Fifth Amendment and decline to answer the
7	to answer the question.	7	question.
8	BY MR. LANDAU:	8	Q. The monies Mr. Straub is receiving here, you
9	Q. What address is that?	9	received some of those monies, haven't you?
10	MR. SALAZAR: Same objection.	10	MR. SALAZAR: Object to the form of the
11	THE WITNESS: On advice of counsel, I'm	11	question and relevancy.
12	exercising my rights under the Fifth Amendment and decline	12	THE WITNESS: On advice of counsel, I'm
13	to answer the question.	13	exercising my rights under the Fifth Amendment and decline
14	BY MR. LANDAU:	14	to answer the question.
15	Q. Ms. Matthews, are you currently facing	15	BY MR. LANDAU:
16	criminal prosecution?	16	Q. Tell me about Botticelli Advisors.
17	A. On advice of counsel, I'm exercising my	17	MR. SALAZAR: Objection to the form of the
18	rights under the Fifth Amendment and decline to answer the	18	question.
19	question.	19	THE WITNESS: On advice of counsel, I'm
20	Q. In fact, currently, you have been indicted	20	exercising my rights under the Fifth Amendment and decline
21	by the U.S. Attorney in Connecticut; correct?	21	to answer the question.
22	A. On advice of counsel, I'm exercising my	22	BY MR. LANDAU:
23	rights under the Fifth Amendment and decline to answer the	23	Q. Do you have an interest in that entity?
24	question.	24	MR. SALAZAR: Object to the form of the
25	Q. You've been indicted for tax evasion;	25	question and relevancy.
	Daga 2/		Paga 36
1	Page 34	,	Page 36
1	correct?	1	THE WITNESS: On advice of counsel, I'm
2	correct? A. On advice of counsel, I'm exercising my	2	THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline
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	Page 37		Page 39
1	MR. SALAZAR: Objection to form and	1	THE WITNESS: On advice of counsel, I'm
2	relevancy.	2	exercising my rights under the Fifth Amendment and decline
3	THE WITNESS: On advice of counsel, I'm	3	to answer the question.
4	exercising my rights under the Fifth Amendment and decline	4	BY MR. LANDAU:
5	to answer the question.	5	Q. And similarly, you were in default on this
6	BY MR. LANDAU:	6	loan; correct?
7	Q. And, in fact, through this wire, Mr. Straub	7	MR. SALAZAR: Same objection.
8	is advancing \$773,277.41, he's advancing that amount of	8	THE WITNESS: On advice of counsel, I'm
9	money on your and your husband's behalf; correct?	9	exercising my rights under the Fifth Amendment and decline
10	MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm	10	to answer the question.
11 12	exercising my rights under the Fifth Amendment and decline	11 12	MR. LANDAU: What are we up to? THE COURT REPORTER: 7.
13	to answer the question.	13	MR. LANDAU: Okay. Let's mark this as 7.
14	MR. LANDAU: Okay. Mark this as Exhibit 6.	14	(Thereupon, Exhibit Number 7 was marked for
15	(Thereupon, Exhibit Number 6 was marked for	15	Identification.)
16	Identification.)	16	BY MR. LANDAU:
17	BY MR. LANDAU:	17	Q. The document that we've labelled as
18	Q. Ms. Matthews, the document that we've	18	Exhibit 7, and it's Bates Numbered 294, Ms. Matthews, have
19	labelled as Exhibit 6, Bates Number 293, have you seen	19	you seen this document before?
20	this letter before?	20	MR. SALAZAR: Objection, relevancy.
21	A. On advice of counsel, I'm exercising my	21	THE WITNESS: On advice of counsel, I'm
22	rights under the Fifth Amendment and decline to answer the	22	exercising my rights under the Fifth Amendment and decline
23	question.	23	to answer the question.
24	Q. It's a letter from Equipment Leasing	24	BY MR. LANDAU:
25	International, LLC to Robert W. Matthews; correct?	25	Q. It's, in fact, a letter to Bob Matthews;
	Page 38		Page 40
			1 450 10
1	A. On advice of counsel, I'm exercising my	1	
1 2	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the	1 2	correct? A. On advice of
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2 3 4 5 6 7 8	rights under the Fifth Amendment and decline to answer the question. MR. SALAZAR: Sorry, objection on the grounds of relevancy. BY MR. LANDAU: Q. And I think it would be fair to say that this is another demand letter from signed by	2 3 4 5 6 7 8	correct? A. On advice of MR. SALAZAR: Same objection. Sorry. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. And the letter is dated September 15, 2010,
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	rights under the Fifth Amendment and decline to answer the question. MR. SALAZAR: Sorry, objection on the grounds of relevancy. BY MR. LANDAU: Q. And I think it would be fair to say that this is another demand letter from signed by Glenn Straub dated August 28, 2010; correct? MR. SALAZAR: Objection, form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. On August 28, 2010, to your knowledge, were you and your husband in default on the loan with Equipment Leasing International, LLC? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. In fact, your husband was in default on this	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. On advice of MR. SALAZAR: Same objection. Sorry. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. And the letter is dated September 15, 2010, do you see that? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. SALAZAR: Same objection. BY MR. LANDAU: Q. And, in fact, it's another demand letter from Mr. Straub; correct? MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. SALAZAR: Let's go ahead and mark this as Composite 8. (Thereupon, Composite Exhibit Number 8 was
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	Page 41		Page 43
1	MR. LANDAU: Yep.	1	more than that, but I don't think you've established the
2	MR. SALAZAR: More than one, what is it?	2	predicate necessary for her to answer.
3	MR. LANDAU: It's 8, Composite 8.	3	BY MR. LANDAU:
4	MR. SALAZAR: So these three	4	Q. Okay. This is an e-mail to you; correct?
5	MR. LANDAU: The whole package, yes.	5	A. On advice of
6	MR. SALAZAR: This here?	6	MR. SALAZAR: Object to relevancy. Sorry.
7	MR. LANDAU: Yep.	7	THE WITNESS: On advice of counsel, I'm
8	MR. SALAZAR: Got it. I'm sorry, I just	8	exercising my rights under the Fifth Amendment and decline
9	want to make sure we have the same ones.	9	to answer the question.
10	MR. LANDAU: Here you go.	10	MR. STRAUB: When are you guys going to take
11	MR. MARIANI: Do you have a paperclip by	11	a break, some kind of idea, before lunch or after lunch,
12	chance?	12	it's 10:14? I don't need a break, for emergency, but it
13	MR. LANDAU: Sorry about that.	13	would be helpful to know.
14	MR. GEORGE: Right here.	14	MR. SALAZAR: Whenever
15	MR. MARIANI: Oh, thanks, David.	15	MR. STRAUB: You're in control.
16	BY MR. LANDAU:	16	Mr. SALAZAR: whenever you want.
17	Q. Ms. Matthews, the documents we've labelled	17	MR. LANDAU: Yeah, whenever you want,
18	as Composite 8 are Bates Numbered 295, 296, and 297. Do		Ms. Matthews. I wasn't
19	you see that document?	19	MR. STRAUB: Your health, anything else,
20	A. On advice of counsel, I'm exercising my	20	nobody cares. What do you think, because she can hold up?
21 22	rights under the Fifth Amendment and decline to answer the	21	MR. LANDAU: I'm just trying to get through as much, because we have a lot of ground to cover with
23	question. Q. Well, no. I asked, do you see the document?	23	Mr. Matthews, too, so I'm just trying to get
24	Do you have the document?	24	THE WITNESS: I'm fine.
25	A. On advice	25	MR. STRAUB: You're fine, strong girls.
23	A. On advice	23	WIK. STRACE. Toute fine, strong girls.
	Page 42		Page 44
1	Page 42 MR. MARIANI: We have Exhibit we have	1	Page 44 America produces strong girls. Okay. I need to see you
1 2		1 2	
	MR. MARIANI: We have Exhibit we have	_	America produces strong girls. Okay. I need to see you
2	MR. MARIANI: We have Exhibit we have Exhibit 8. BY MR. LANDAU: Q. Do you have the exhibit? Do you have	2	America produces strong girls. Okay. I need to see you for a second. MR. SALAZAR: Okay. Can we take a break? MR. STRAUB: No, no, no, go, go, go. It
2 3	MR. MARIANI: We have Exhibit we have Exhibit 8. BY MR. LANDAU: Q. Do you have the exhibit? Do you have Exhibit 8?	2 3	America produces strong girls. Okay. I need to see you for a second. MR. SALAZAR: Okay. Can we take a break? MR. STRAUB: No, no, no, go, go, go. It wasn't I'll text you. I'll make you a little note.
2 3 4	MR. MARIANI: We have Exhibit we have Exhibit 8. BY MR. LANDAU: Q. Do you have the exhibit? Do you have Exhibit 8? MR. MARIANI: I will I will say I handed	2 3 4	America produces strong girls. Okay. I need to see you for a second. MR. SALAZAR: Okay. Can we take a break? MR. STRAUB: No, no, no, go, go, go. It
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Page 45 1 BY MR. LANDAU: 2 Q. And just so we're clear, 295 is an e-mail 3 which attaches a letter dated October 7, 2010, and also 4 a the first page of a complaint, with the handwritten 5 word draft on the top. Do you see that? 6 MR. SALAZAR: Objection to the form and 7 relevancy. 8 THE WITNESS: On advice of counsel, I'm 9 exercising my rights under the Fifth Amendment and decline to answer the question. 10 to answer the question. 11 BY MR. LANDAU: 12 Q. Through this e-mail, Mr. Galle is seeking to to answer the question. 13 hold you in default on a loan; correct? 14 MR. SALAZAR: Objection to form and relevancy. 15 relevancy. 16 THE WITNESS: On advice of counsel, I'm 17 exercising my rights under the Fifth Amendment and decline to answer the question. 18 to answer the question. 19 MR. LANDAU: So I'm about to show her a complaint. 20 complaint, a very lengthy complaint, and that's why I didn't make enough copies. I have a copy for you, but I had e-mailed Mr. Salazar earlier with a link to to the complaint. Page 46 1 What are we up to? 2 THE COURT REPORTER: That will be 9. Gay. Let's go ahead and mark this Exhibit 9. 3 MR. LANDAU: That will be 9. Okay. Let's go ahead and mark this Exhibit 9. 4 MR. MARIANI: So is that my copy? 5 MR. LANDAU: Than will be 9. Okay. Let's go ahead and mark this Exhibit 9. 4 MR. LANDAU: This will be 9. Okay. Let's go ahead and mark this Exhibit 9. 5 (Thereupon, Exhibit Number 9 was marked for I dentification.) 7 MR. MARIANI: Thank you. 9 MR. LANDAU: Yeah. 9 MR. LANDA
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,
15 It's the Palm House one. 15 in maybe, maybe you can help her.
MR. GEORGE: Oh, it's the Palm House? 16 BY MR. LANDAU:
MR. SALAZAR: Yeah. 17 Q. This is a complaint filed by Palm House
MR. MARIANI: Let me see that for a second. 18 Hotel, LLLP against a number of defendants, including
THE WITNESS: Uh-huh. 19 yourself. Do you see that?
MR. MARIANI: Take a look at it. It's 20 A. On advice of counsel, I'm exercising my
21 double sided. 21 rights under the Fifth Amendment and decline to answer the
MR. LANDAU: Yes, trying to save trees. 22 question.
MR. SALAZAR: When it comes time to go to 23 Q. Okay. Well, the second name in under the
24 trial in this thing, if you want to talk to the Judge 24 defendants, that's you; correct?
25 about using just using iPads, try and cut down on the 25 A. On advice of counsel, I'm exercising my

	Page 49		Page 51
1	rights under the Fifth Amendment and decline to answer the	1	Q. And, in fact, isn't it true that you did
2	question.	2	divert funds from that otherwise belonged to Palm House
3	Q. And through this complaint, Palm House	3	Hotel, LLLP, and diverted them in to purchase the yacht?
4	Hotel, LLLP is basically accusing you of stealing from	4	MR. SALAZAR: Objection to form and
5	them. Do you understand that?	5	relevancy.
6	MR. SALAZAR: Objection to form and	6	MR. STRAUB: Was it a question?
7	relevance.	7	MR. SALAZAR: Was that the end of the
8	THE WITNESS: On advice of counsel, I'm	8	question?
9	exercising my rights under the Fifth Amendment and decline	9	MR. LANDAU: Yeah.
10	to answer the question.	10	MR. SALAZAR: Okay.
11	BY MR. LANDAU:	11	MR. STRAUB: Was that a question?
12	Q. In fact, they're asserting claims of	12	MR. SALAZAR: It was.
13	fraudulent transfer, RICO, among other claims; isn't that	13	THE WITNESS: On advice of counsel, I'm
14	true?	14	exercising my rights under the Fifth Amendment and decline
15	MR. SALAZAR: Same objection.	15	to answer the question.
16	THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline	16 17	MR. STRAUB: I think they're just
17 18	to answer the question.	18	statements, they're not questions. BY MR. LANDAU:
19	BY MR. LANDAU:	19	Q. Ms. Matthews, what, if anything, do you know
20	Q. I'd ask you to turn to Page 5 of 54 5 of	20	about an entity called Mirabia, LLC?
21	44, and I would refer you to Paragraph 17. It discusses	21	A. On advice of counsel, I'm exercising my
22	Alibi, LLC. Have you ever heard of that entity Alibi, LLC	22	rights under the Fifth Amendment and decline to answer the
23	before?	23	question.
24	A. On advice of counsel, I'm exercising my	24	MR. SALAZAR: Object on relevancy.
25	rights under the Fifth Amendment and decline to answer the	25	BY MR. LANDAU:
	<u> </u>		
	Page 50		Page 52
1	Page 50 question.	1	Q. Did Mirabia, LLC purchase a property located
2	question. Q. And it discusses that you're the sole and	2	Q. Did Mirabia, LLC purchase a property located at 149 Brazilian Avenue, Palm Beach, Florida?
2 3	question. Q. And it discusses that you're the sole and managing member of Alibi, LLC; correct?	2 3	Q. Did Mirabia, LLC purchase a property located at 149 Brazilian Avenue, Palm Beach, Florida? MR. SALAZAR: Objection, form and relevancy.
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2 BY MR. LANDAU: 3 O, then let's jump down to Paragraph 6. Do 4 exercising my rights under the Fifth Amendment and decline 5 to answer the question. 8 PY MR. LANDAU: 9 MR. SALAZAR: Same objection. 11 exercising my rights under the Fifth Amendment and decline 12 to answer the question. 13 BY MR. LANDAU: 14 Q. Ms. Matthews, I'd ask you to turn to Page 12 15 of 44 of the complaint. 16 MR. SALAZAR: 12 out of 44. 17 BY MR. LANDAU: 18 Q. And the first allegation at Paragraph 61. 18 BY MR. LANDAU: 19 ANDAU: 20 And the first allegation at Paragraph 61. 21 ANDAU: 22 MR. MARIAN: You said Page 12 of 44; 23 MR. MARIAN: You said Page 12 of 44? 24 MR. LANDAU: Page 12 of 44, and the first 25 MR. MARIAN: Yes, we're there. 26 MR. MARIAN: What paragraph is 61. 27 MR. MARIAN: What paragraph is 61. 28 MR. MARIAN: What paragraph is 61. 29 MR. MARIAN: What paragraph is 61. 20 MR. MARIAN: What paragraph is 61. 21 MR. MARIAN: What paragraph is 61. 22 MR. LANDAU: paragraph is 61. 23 MR. MARIAN: What paragraph is 61. 24 MR. MARIAN: What paragraph is 61. 25 MR. MARIAN: What paragraph is 61. 26 MR. MARIAN: What paragraph is 61. 27 MR. MARIAN: What paragraph is 61. 28 MR. MARIAN: What paragraph is 61. 29 MR. MARIAN: What paragraph is 61. 29 MR. MARIAN: What paragraph is 61. 20 MR. MARIAN: What paragraph is 61. 21 MR. MARIAN: What paragraph is 61. 22 MR. MARIAN: What paragraph is 61. 23 MR. MARIAN: What paragraph is 61. 24 MR. MARIAN: What paragraph is 61. 25 MR. MARIAN: What paragraph is 61. 26 MR. MARIAN: What paragraph is 61. 27 MR. MARIAN: What paragraph is 61. 28 MR. LANDAU: What paragraph is 61. 29 MR. LANDAU: What paragraph is 61. 29 MR. MARIAN: What paragraph is 61. 20 MR. MARIAN: What paragraph is 61. 21 MR. MARIAN: What paragraph is 61. 22 MR. MARIAN: What paragraph is 61. 23 MR. MR. MARIAN: What paragraph is 61. 24 MR. MARIAN: What paragraph is 61. 25 MR. MARIAN: What paragraph is 61. 26 MR. MARIAN: Matthews is 61. 27 MR. MARIAN: Matthews is 61. 28 MR. MARIAN: Matthews is 61. 29 MR. MARIAN: Matthews is 61. 29 MR. MARIAN: Matt	1		1	·
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The Witness. Q. If that's not correct, why don't you show us to the documents proving it's not correct? MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. SALAZAR: 12 out of 44. The Symmetrial expectation of the complaint. MR. SALAZAR: 12 out of 44. The Witness. And the first allegation ar Paragraph 61. THE WITNESS: On advice — And Mariant's What paragraph? MR. MARIANI: Vous aid Page 12 of 44? MR. MARIANI: What paragraph? MR. MARIANI: Okay. I'll point that out to to to add the statement. Page 54 The Witness. I the witness. MR. MARIANI: Yes, we're there? MR. MARIANI: Okay. Fill point that out to to to add the statement. MR. MARIANI: Objection to form. The complaint speaks for itself. I'm going to direct the witness not to read the statement. MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. SALAZAR: Object to form, relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: O. Okay. Well, I'll read it. It says, Robert and maria streament and marked and waria then proceeded to open up their own bank account in the name of 160 Royal Palm with Regions Bank. Do you see that Marias St. 8 million purchase of the lot adjacent to the hotel located at 149 Brazilian AR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: No satisfact a few and maria the proceeded to open up their own		•		• •
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25 exercising my rights under the Fifth Amendment, and 25 MR. SALAZAR: Objection, form and relevancy.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MR. MARIANI: Yes, we're there. BY MR. LANDAU: Q. Ms. Matthews, why don't you read that first allegation for us? MR. MARIANI: Objection to form. The complaint speaks for itself. I'm going to direct the witness not to read the statement. BY MR. LANDAU: Q. Okay. Well, I'll read it. It says, Robert and Maria then proceeded to open up their own bank account in the name of 160 Royal Palm with Regions Bank. Do you see that, Ms. Matthews? MR. SALAZAR: Object to form, relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. In fact, it's true that you did that, correct, Ms. Matthews? A. On advice of counsel MR. SALAZAR: Object to form and relevancy.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Evans transferred \$12,452.05 directly to Dovenmuehle Mortgage Company for payment of Robert and Maria's residential mortgage. Ms. Matthews, do you see that paragraph? MR. SALAZAR: Objection, form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Is that true, that over \$12,000 was transferred to directly to your mortgage company for the mortgage on your residential home? MR. SALAZAR: Objection to relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Next paragraph, on June 6, 2014, Evans transferred a million dollars to Mirabia, which was used the same day as deposit on Mirabia's \$5.8 million purchase of the lot adjacent to the hotel located at 149 Brazilian Avenue.
	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	MR. MARIANI: Yes, we're there. BY MR. LANDAU: Q. Ms. Matthews, why don't you read that first allegation for us? MR. MARIANI: Objection to form. The complaint speaks for itself. I'm going to direct the witness not to read the statement. BY MR. LANDAU: Q. Okay. Well, I'll read it. It says, Robert and Maria then proceeded to open up their own bank account in the name of 160 Royal Palm with Regions Bank. Do you see that, Ms. Matthews? MR. SALAZAR: Object to form, relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. In fact, it's true that you did that, correct, Ms. Matthews? A. On advice of counsel MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Evans transferred \$12,452.05 directly to Dovenmuehle Mortgage Company for payment of Robert and Maria's residential mortgage. Ms. Matthews, do you see that paragraph? MR. SALAZAR: Objection, form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Is that true, that over \$12,000 was transferred to directly to your mortgage company for the mortgage on your residential home? MR. SALAZAR: Objection to relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Next paragraph, on June 6, 2014, Evans transferred a million dollars to Mirabia, which was used the same day as deposit on Mirabia's \$5.8 million purchase of the lot adjacent to the hotel located at 149 Brazilian Avenue. Do you see that allegation, Ms. Matthews?

	Page 57		Page 59
1	THE WITNESS: On advice of counsel, I'm	1	MR. SALAZAR: Same objection.
2	exercising my rights under the Fifth Amendment and decline	2	THE WITNESS: On advice of counsel, I'm
3	to answer the question.	3	exercising my rights under the Fifth Amendment and decline
4	BY MR. LANDAU:	4	to answer the question.
5	Q. Is that allegation true, Ms. Matthews?	5	BY MR. LANDAU:
6	MR. SALAZAR: Same objection.	6	Q. The funds identified in Paragraph 72, can
7	THE WITNESS: On advice of counsel, I'm	7	you tell us where those funds went and what they were used
8	exercising my rights under the Fifth Amendment and decline	8	for?
9	to answer the question.	9	MR. SALAZAR: Same objection.
10	BY MR. LANDAU:	10	THE WITNESS: On advice of counsel, I'm
11	Q. In fact, it is true, correct, Ms. Matthews?	11	exercising my rights under the Fifth Amendment and decline
12	MR. SALAZAR: Same objection.	12	to answer the question.
13	THE WITNESS: On advice of counsel, I'm	13	BY MR. LANDAU:
14	exercising my rights under the Fifth Amendment and decline	14	Q. These were funds that were supposed to be
15	to answer the question.	15	used for the construction of 160 Royal Palm, LLC; correct?
16	BY MR. LANDAU:	16	MR. SALAZAR: Objection to form
17	Q. Let's jump to Page 13 of 44, and	17	THE WITNESS: On advice
18	Ms. Matthews, I would refer you to Paragraph 72 of the	18	MR. SALAZAR: relevancy.
19	complaint. Are you there?	19	THE WITNESS: of counsel, I'm exercising
20	MR. MARIANI: I'll point out Paragraph 72 to	20	my rights under the Fifth Amendment and decline to answer
21	the witness.	21	the question.
22	MR. LANDAU: Okay.	22	BY MR. LANDAU:
23 24	BY MR. LANDAU:	23	Q. Ms. Matthews, I'd ask you to turn to Page 15
25	Q. And Paragraph 72 says, additionally, Robert and Maria, meaning Maria Matthews, had the following	24 25	of 44. Are you there? MR. MARIANI: We have Page 15. Is there a
23	and Maria, meaning Maria Matthews, had the following	23	WIK. WAKIANI. We have rage 15. Is there a
	Page 58		Page 60
1	Page 58 amounts transferred into the Regions account, which are	1	Page 60 paragraph you're interested in?
1 2		1 2	
	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that?		paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80.
2 3 4	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that? MR. SALAZAR: Object to form and relevancy.	2 3 4	paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80. MR. MARIANI: Okay. I've pointed that out
2 3	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm	2 3 4 5	paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80. MR. MARIANI: Okay. I've pointed that out to the witness.
2 3 4 5 6	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline	2 3 4 5 6	paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80. MR. MARIANI: Okay. I've pointed that out to the witness. BY MR. LANDAU:
2 3 4 5	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm	2 3 4 5 6 7	paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80. MR. MARIANI: Okay. I've pointed that out to the witness. BY MR. LANDAU: Q. Paragraph 80 reads, additionally, on May 27,
2 3 4 5 6 7 8	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU:	2 3 4 5 6 7 8	paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80. MR. MARIANI: Okay. I've pointed that out to the witness. BY MR. LANDAU: Q. Paragraph 80 reads, additionally, on May 27, 2014, a check in the amount of \$1,100,000 was issued on
2 3 4 5 6 7 8 9	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. And isn't it true that the monies identified	2 3 4 5 6 7 8 9	paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80. MR. MARIANI: Okay. I've pointed that out to the witness. BY MR. LANDAU: Q. Paragraph 80 reads, additionally, on May 27, 2014, a check in the amount of \$1,100,000 was issued on the Regions account payable to Bonaventure, a company
2 3 4 5 6 7 8 9 10	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. And isn't it true that the monies identified in Paragraph 72 are monies that were diverted for your	2 3 4 5 6 7 8 9 10	paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80. MR. MARIANI: Okay. I've pointed that out to the witness. BY MR. LANDAU: Q. Paragraph 80 reads, additionally, on May 27, 2014, a check in the amount of \$1,100,000 was issued on the Regions account payable to Bonaventure, a company owned by Maria and Robert. Do you see that?
2 3 4 5 6 7 8 9 10	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. And isn't it true that the monies identified in Paragraph 72 are monies that were diverted for your personal benefit?	2 3 4 5 6 7 8 9 10 11	paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80. MR. MARIANI: Okay. I've pointed that out to the witness. BY MR. LANDAU: Q. Paragraph 80 reads, additionally, on May 27, 2014, a check in the amount of \$1,100,000 was issued on the Regions account payable to Bonaventure, a company owned by Maria and Robert. Do you see that? MR. SALAZAR: Objection, relevancy.
2 3 4 5 6 7 8 9 10 11 12	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. And isn't it true that the monies identified in Paragraph 72 are monies that were diverted for your personal benefit? MR. SALAZAR: Object to form and relevancy.	2 3 4 5 6 7 8 9 10 11 12	paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80. MR. MARIANI: Okay. I've pointed that out to the witness. BY MR. LANDAU: Q. Paragraph 80 reads, additionally, on May 27, 2014, a check in the amount of \$1,100,000 was issued on the Regions account payable to Bonaventure, a company owned by Maria and Robert. Do you see that? MR. SALAZAR: Objection, relevancy. THE WITNESS: On the advice of counsel, I'm
2 3 4 5 6 7 8 9 10 11 12 13	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. And isn't it true that the monies identified in Paragraph 72 are monies that were diverted for your personal benefit? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On the advice of counsel, I'm	2 3 4 5 6 7 8 9 10 11 12 13	paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80. MR. MARIANI: Okay. I've pointed that out to the witness. BY MR. LANDAU: Q. Paragraph 80 reads, additionally, on May 27, 2014, a check in the amount of \$1,100,000 was issued on the Regions account payable to Bonaventure, a company owned by Maria and Robert. Do you see that? MR. SALAZAR: Objection, relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline
2 3 4 5 6 7 8 9 10 11 12 13 14	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. And isn't it true that the monies identified in Paragraph 72 are monies that were diverted for your personal benefit? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline	2 3 4 5 6 7 8 9 10 11 12 13 14	paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80. MR. MARIANI: Okay. I've pointed that out to the witness. BY MR. LANDAU: Q. Paragraph 80 reads, additionally, on May 27, 2014, a check in the amount of \$1,100,000 was issued on the Regions account payable to Bonaventure, a company owned by Maria and Robert. Do you see that? MR. SALAZAR: Objection, relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.
2 3 4 5 6 7 8 9 10 11 12 13 14 15	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. And isn't it true that the monies identified in Paragraph 72 are monies that were diverted for your personal benefit? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80. MR. MARIANI: Okay. I've pointed that out to the witness. BY MR. LANDAU: Q. Paragraph 80 reads, additionally, on May 27, 2014, a check in the amount of \$1,100,000 was issued on the Regions account payable to Bonaventure, a company owned by Maria and Robert. Do you see that? MR. SALAZAR: Objection, relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU:
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. And isn't it true that the monies identified in Paragraph 72 are monies that were diverted for your personal benefit? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU:	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80. MR. MARIANI: Okay. I've pointed that out to the witness. BY MR. LANDAU: Q. Paragraph 80 reads, additionally, on May 27, 2014, a check in the amount of \$1,100,000 was issued on the Regions account payable to Bonaventure, a company owned by Maria and Robert. Do you see that? MR. SALAZAR: Objection, relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Is there anything stated in Paragraph 80
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. And isn't it true that the monies identified in Paragraph 72 are monies that were diverted for your personal benefit? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Ms. Matthews, did you pay taxes on those funds?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80. MR. MARIANI: Okay. I've pointed that out to the witness. BY MR. LANDAU: Q. Paragraph 80 reads, additionally, on May 27, 2014, a check in the amount of \$1,100,000 was issued on the Regions account payable to Bonaventure, a company owned by Maria and Robert. Do you see that? MR. SALAZAR: Objection, relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Is there anything stated in Paragraph 80 that is incorrect? MR. SALAZAR: Objection to form and
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. And isn't it true that the monies identified in Paragraph 72 are monies that were diverted for your personal benefit? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Ms. Matthews, did you pay taxes on those funds? MR. SALAZAR: Same objection. THE WITNESS: On the advice of counsel, I'm	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80. MR. MARIANI: Okay. I've pointed that out to the witness. BY MR. LANDAU: Q. Paragraph 80 reads, additionally, on May 27, 2014, a check in the amount of \$1,100,000 was issued on the Regions account payable to Bonaventure, a company owned by Maria and Robert. Do you see that? MR. SALAZAR: Objection, relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Is there anything stated in Paragraph 80 that is incorrect? MR. SALAZAR: Objection to form and relevancy. THE WITNESS: On advice of counsel, I'm
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. And isn't it true that the monies identified in Paragraph 72 are monies that were diverted for your personal benefit? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Ms. Matthews, did you pay taxes on those funds? MR. SALAZAR: Same objection. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80. MR. MARIANI: Okay. I've pointed that out to the witness. BY MR. LANDAU: Q. Paragraph 80 reads, additionally, on May 27, 2014, a check in the amount of \$1,100,000 was issued on the Regions account payable to Bonaventure, a company owned by Maria and Robert. Do you see that? MR. SALAZAR: Objection, relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Is there anything stated in Paragraph 80 that is incorrect? MR. SALAZAR: Objection to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. And isn't it true that the monies identified in Paragraph 72 are monies that were diverted for your personal benefit? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Ms. Matthews, did you pay taxes on those funds? MR. SALAZAR: Same objection. THE WITNESS: On the advice of counsel, I'm	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80. MR. MARIANI: Okay. I've pointed that out to the witness. BY MR. LANDAU: Q. Paragraph 80 reads, additionally, on May 27, 2014, a check in the amount of \$1,100,000 was issued on the Regions account payable to Bonaventure, a company owned by Maria and Robert. Do you see that? MR. SALAZAR: Objection, relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Is there anything stated in Paragraph 80 that is incorrect? MR. SALAZAR: Objection to form and relevancy. THE WITNESS: On advice of counsel, I'm
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. And isn't it true that the monies identified in Paragraph 72 are monies that were diverted for your personal benefit? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Ms. Matthews, did you pay taxes on those funds? MR. SALAZAR: Same objection. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80. MR. MARIANI: Okay. I've pointed that out to the witness. BY MR. LANDAU: Q. Paragraph 80 reads, additionally, on May 27, 2014, a check in the amount of \$1,100,000 was issued on the Regions account payable to Bonaventure, a company owned by Maria and Robert. Do you see that? MR. SALAZAR: Objection, relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Is there anything stated in Paragraph 80 that is incorrect? MR. SALAZAR: Objection to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	amounts transferred into the Regions account, which are attributed to loan funds, and there is then a chart totalling approximately \$9.5 million. Do you see that? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. And isn't it true that the monies identified in Paragraph 72 are monies that were diverted for your personal benefit? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Ms. Matthews, did you pay taxes on those funds? MR. SALAZAR: Same objection. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU:	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	paragraph you're interested in? MR. LANDAU: Yes, and I would direct your attention to Paragraph 80. MR. MARIANI: Okay. I've pointed that out to the witness. BY MR. LANDAU: Q. Paragraph 80 reads, additionally, on May 27, 2014, a check in the amount of \$1,100,000 was issued on the Regions account payable to Bonaventure, a company owned by Maria and Robert. Do you see that? MR. SALAZAR: Objection, relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Is there anything stated in Paragraph 80 that is incorrect? MR. SALAZAR: Objection to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU:

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	Page 61		•
1	MR. SALAZAR: Form and relevancy objection.	1	witness.
2	THE WITNESS: On advice of counsel, I'm	2	BY MR. LANDAU:
3	exercising my rights under the Fifth Amendment and decline		Q. Is there anything in those paragraphs that
5	to answer the question. BY MR. LANDAU:	4 5	is not accurate?
6	Q. In fact, everything stated in Paragraph 80		MR. SALAZAR: Objection to form and
7	is correct, and true, and accurate; correct?	6 7	relevancy. THE WITNESS: On advice of counsel, I'm
8	MR. SALAZAR: Form, relevancy, and asked and	8	exercising my rights under the Fifth Amendment and decline
9	answered objection.	9	to answer the question.
10	THE WITNESS: On advice of counsel, I'm	10	BY MR. LANDAU:
11	exercising my rights under the Fifth Amendment and decline		Q. Is there anything in Paragraphs 82 and 83
12	to answer the question.	12	that are not true and correct?
13	BY MR. LANDAU:	13	MR. SALAZAR: Same objection.
14	Q. The \$1,100,000 identified here is money that	14	THE WITNESS: On advice of counsel, I'm
15	was supposed to go to the construction of the Palm House	15	exercising my rights under the Fifth Amendment and decline
16	Hotel; correct?	16	to answer the question.
17	MR. SALAZAR: Objection, form and relevancy.	17	BY MR. LANDAU:
18	THE WITNESS: On advice of counsel, I'm	18	Q. In fact, everything in Paragraphs 82 and 83
19	exercising my rights under the Fifth Amendment and decline		are true and correct, yes?
20	to answer the question.	20	MR. SALAZAR: Same objection.
21	BY MR. LANDAU:	21	THE WITNESS: On advice of counsel, I'm
22	Q. And, in fact, that money, \$1,100,000, did	22	exercising my rights under the Fifth Amendment and decline
23	not go to the Palm House Hotel; correct?	23	to answer the question.
24	MR. SALAZAR: Same objection.	24	BY MR. LANDAU:
25	THE WITNESS: On advice of counsel, I'm	25	Q. Ms. Matthews, in Paragraph 83, it discusses,
	Page 62		Page 64
			1 age 04
1	exercising my rights under the Fifth Amendment and decline	1	and I'm quoting "a total of \$2,272,728.33 was paid from
1 2	exercising my rights under the Fifth Amendment and decline to answer the question.	1 2	and I'm quoting "a total of \$2,272,728.33 was paid from the Regions account to pay for the purchase of the yacht
	to answer the question. BY MR. LANDAU:		and I'm quoting "a total of \$2,272,728.33 was paid from
2 3 4	to answer the question. BY MR. LANDAU: Q. Ms. Matthews, can you explain to us where	2 3 4	and I'm quoting "a total of \$2,272,728.33 was paid from the Regions account to pay for the purchase of the yacht and related expenses." Do you see that? A. On the
2 3 4 5	to answer the question. BY MR. LANDAU: Q. Ms. Matthews, can you explain to us where the \$1,100,000 went and what it was used for?	2 3 4 5	and I'm quoting "a total of \$2,272,728.33 was paid from the Regions account to pay for the purchase of the yacht and related expenses." Do you see that? A. On the MR. SALAZAR: Object to form, relevancy.
2 3 4 5 6	to answer the question. BY MR. LANDAU: Q. Ms. Matthews, can you explain to us where the \$1,100,000 went and what it was used for? MR. SALAZAR: Objection to form, relevancy.	2 3 4 5 6	and I'm quoting "a total of \$2,272,728.33 was paid from the Regions account to pay for the purchase of the yacht and related expenses." Do you see that? A. On the MR. SALAZAR: Object to form, relevancy. THE WITNESS: On the advice of counsel, I'm
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2 3 4 5 6 7 8 9 10	to answer the question. BY MR. LANDAU: Q. Ms. Matthews, can you explain to us where the \$1,100,000 went and what it was used for? MR. SALAZAR: Objection to form, relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. The paragraph refers to a company called	2 3 4 5 6 7 8 9 10	and I'm quoting "a total of \$2,272,728.33 was paid from the Regions account to pay for the purchase of the yacht and related expenses." Do you see that? A. On the MR. SALAZAR: Object to form, relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Can you explain to us what those funds were used for?
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	Page 65		Paga 67
1	·	1	Page 67 THE WITNESS: On advice of counsel, I'm
1 2	Q. I'd ask you to turn to Page 17 of 44. MR. MARIANI: Which paragraph?	1 2	exercising my rights under the Fifth Amendment and decline
3	BY MR. LANDAU:	3	to answer the question.
4	Q. And I'd refer your attention direct your	4	BY MR. LANDAU:
5	attention to Paragraph 90, and that paragraph begins, a	5	Q. So, for the record, you're refusing to
6	summary of the funds disbursed by either the Evans' firm's	6	explain what happened to this \$24 million?
7	IOLTA account, do you see that?	7	MR. SALAZAR: Objection, form and relevancy.
8	MR. MARIANI: I've pointed that out to the	8	THE WITNESS: On advice of counsel, I am
9	witness.	9	exercising my rights under the Fifth Amendment and decline
10	MR. LANDAU: Okay.	10	to answer the question.
11	BY MR. LANDAU:	11	BY MR. LANDAU:
12	Q. And below that, there is a chart of of	12	Q. Ms. Matthews, I'd ask you to turn to Page 20
13	monies.	13	of 44.
14	Have you pointed that out to the witness?	14	MR. MARIANI: Which paragraph?
15	MR. MARIANI: Yes.	15	BY MR. LANDAU:
16	MR. LANDAU: Okay.	16	Q. And I direct your attention to 106, 106.
17	BY MR. LANDAU:	17	MR. MARIANI: I've pointed that out to the
18	Q. Ms. Matthews, is there anything in	18	witness.
19	Paragraph 90 that is not true and correct?	19	BY MR. LANDAU:
20	MR. SALAZAR: Object to the form and	20	Q. Is there anything in Paragraph 106 that is
21	relevancy.	21	not true or correct?
22	THE WITNESS: On advice of counsel, I'm	22	MR. SALAZAR: Object to the form and
23	exercising my rights under the Fifth Amendment and decline	23	relevancy.
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25	BY MR. LANDAU:	25	exercising my rights under the Fifth Amendment and decline
	Page 66		Page 68
1	Page 66 Q. In fact, everything in Paragraph 90 is true,	1	Page 68 to answer the question.
1 2	Q. In fact, everything in Paragraph 90 is true, correct and accurate; correct?	1 2	to answer the question. BY MR. LANDAU:
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2	Q. In fact, everything in Paragraph 90 is true, correct and accurate; correct? MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm	2 3 4	to answer the question. BY MR. LANDAU: Q. In fact, everything in Paragraph 106 is true, correct and accurate; is that correct?
2 3	Q. In fact, everything in Paragraph 90 is true, correct and accurate; correct? MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline	2 3 4 5	to answer the question. BY MR. LANDAU: Q. In fact, everything in Paragraph 106 is true, correct and accurate; is that correct? MR. SALAZAR: Same objection.
2 3 4 5 6	Q. In fact, everything in Paragraph 90 is true, correct and accurate; correct? MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.	2 3 4 5 6	to answer the question. BY MR. LANDAU: Q. In fact, everything in Paragraph 106 is true, correct and accurate; is that correct? MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm
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	Page 69		Page 71
1	to answer the question.	1	MR. MARIANI: Excuse me, Counsel, how much
2	MR. GEORGE: Excuse me, Phil, what paragraph	2	longer with this document?
3	are you referring to?	3	MR. LANDAU: I don't know.
4	MR. LANDAU: 106.	4	MR. MARIANI: How about if we is it a
5	MR. GEORGE: Thank you.	5	convenient time for a break?
6	BY MR. LANDAU:	6	MR. LANDAU: Absolutely.
7	Q. Next Paragraph, 107, do you see 107?	7	MR. MARIANI: Okay. Let's do that.
8	MR. MARIANI: I've pointed that out to the	8	(Thereupon, a brief recess was taken, after
9	witness.	9	which the following proceedings were had:)
10	BY MR. LANDAU:	10	BY MR. LANDAU:
11	Q. 107 reads, the loan funds have also been	11	Q. Ms. Matthews, I'd ask you to jump to I
12	fraudulently used by 160 Royal Palm to purchase a new	12	pulled this out of order, let's make sure we're correct.
13	Maserati automobile for Maria's exclusive use.	13	Can you jump to Exhibit D in this complaint?
14	Is that true, Ms. Matthews?	14	MR. SALAZAR: Do you know what document that
15	MR. SALAZAR: Objection, relevancy.	15	is, by any chance?
16	THE WITNESS: On advice of counsel, I'm	16	MR. LANDAU: It's a Les Evans QuickBooks
17	exercising my rights under the Fifth Amendment and decline	17	Quick report.
18	to answer the question.	18	BY MR. LANDAU:
19	BY MR. LANDAU:	19	Q. Ms. Matthews, is there any point in time
20	Q. Has Mr. Straub driven with you in that	20	where you lived with Mr. Straub?
21	Maserati?	21	MR. SALAZAR: Object to the form and
22	MR. SALAZAR: Objection, form,	22 23	relevancy.
23 24	argumentative, irrelevant. THE WITNESS: On the advice of counsel, I'm	24	THE WITNESS: On advice of counsel, I'm
25	exercising my rights under the Fifth Amendment and decline	25	exercising my rights under the Fifth Amendment and decline to answer the question.
23	exercising my rights under the Pitti Amendment and decime	23	to answer the question.
	Page 70		Page 72
1	to answer the question.	1	BY MR. LANDAU:
2	BY MR. LANDAU:	2	Q. In fact, there's been there has been a
3	Q. Did Mr. Straub help you purchase or help you	3	point in time where you've lived with Mr. Straub; correct?
4	pick out that Maserati?	4	MR. SALAZAR: Same objection.
5	MR. SALAZAR: Objection, irrelevant, lack of	5	THE WITNESS: On advice of counsel, I'm
6	foundation.	6	exercising my rights under the Fifth Amendment and decline
7	THE WITNESS: On advice of counsel, I'm	7	to answer the question.
8	exercising my rights under the Fifth Amendment and decline		MR. SALAZAR: Pardon me, did you say what
9	to answer the question.	9	exhibit did you say, D?
10	BY MR. LANDAU:	10	MR. LANDAU: I think is it D, or is it C
11	Q. In fact, isn't it true that Mr. Straub	11	or D? It might be C.
12	helped you pick out the Maserati that's referred to in	12	MR. MARIANI: Do you know how far from the
13 14	Paragraph 107?	13 14	end of the document it is?
15	MR. SALAZAR: I'm going to object on the grounds of lack of foundation	15	MR. LANDAU: Well, all the exhibits are at the end, they're in alphabetical order
16	BY MR. LANDAU:	16	MR. MARIANI: No, I understand that, but
17	Q. Okay. You can answer.	17	there is no full exhibit page.
	Q. Okay. Tou can answer.	18	MR. LANDAU: Which exhibit is that?
18	MR_SALAZAR: relevancy and the fact		THE DIE OF THE CAMER IS HIM.
18 19	MR. SALAZAR: relevancy, and the fact that you have no basis to even ask that question or even		MR. SALAZAR· C
19	that you have no basis to even ask that question or even	19	MR. SALAZAR: C. MR. MARIANI: You're changing now from D to
19 20	that you have no basis to even ask that question or even sure whether that's true.	19 20	MR. MARIANI: You're changing now from D to
19 20 21	that you have no basis to even ask that question or even sure whether that's true. BY MR. LANDAU:	19 20 21	MR. MARIANI: You're changing now from D to C?
19 20 21 22	that you have no basis to even ask that question or even sure whether that's true. BY MR. LANDAU: Q. You can answer.	19 20 21 22	MR. MARIANI: You're changing now from D to C? MR. LANDAU: It's C, C. I said it was
19 20 21	that you have no basis to even ask that question or even sure whether that's true. BY MR. LANDAU:	19 20 21	MR. MARIANI: You're changing now from D to C?

	Page 73		Page 75
1	MR. LANDAU: I'm holding two double-side	1	Q. And that check was for the payment of your
2	pages.	2	personal property taxes that we discussed earlier;
3	MR. MARIANI: No, but are they numbered?	3	correct?
4	MR. LANDAU: They are not. It's just behind	4	MR. SALAZAR: Objection, form, relevancy.
5	Exhibit C.	5	THE WITNESS: On advice of counsel, I'm
6	John, do you want me to flip through it and	6	exercising my rights under the Fifth Amendment and decline
7	find it?	7	to answer the question.
8	MR. MARIANI: Here, yeah, do it.	8	BY MR. LANDAU:
9	MR. LANDAU: Yep, thanks. Here we go.	9	Q. Further down, April 18, 2014, there are two
10	Yeah.	10	wires to Dovenmuehle Mortgage, one in the amount of
11	MR. MARIANI: Okay.	11	\$92,700, and another in the amount of \$42,300.
12	BY MR. LANDAU:	12	Those amounts are for payment of your
13	Q. Ms. Matthews, I'm showing you Exhibit C of	13	personal mortgage on your personal home; correct?
14	this complaint. Have you ever seen this document before?	14	A. On advice of counsel, I'm exercising my
15	A. On advice of counsel, I'm exercising my	15	rights under the Fifth Amendment and decline to answer the
16	rights under the Fifth Amendment and decline to answer the	16	question.
17 18	question.	17	Q. Ms. Matthews, any of the checks that are
19	Q. Exhibit C is a QuickBooks Quick Report of Les Evans' trust account; correct?	18 19	referenced on this exhibit, is it your position that were any of them not, in fact, paid?
20	MR. SALAZAR: Object to form and relevancy.	20	A. On advice of counsel, I'm exercising my
21	THE WITNESS: On advice of counsel, I'm	21	rights under the Fifth Amendment and decline to answer the
22	exercising my rights under the Fifth Amendment and decline	22	question.
23	to answer the question.	23	MR. SALAZAR: I apologize, I didn't realize
24	BY MR. LANDAU:	24	that was the end of the question.
25	Q. And at the top of the document it says,	25	Objection to form and relevancy.
			, , , , , , , , , , , , , , , , , , ,
	Page 74		Page 76
1	Page 74 First United IOLTA, and under that Matthews, Palm House.	1	Page 76 BY MR. LANDAU:
1 2	First United IOLTA, and under that Matthews, Palm House. Do you see that?	1 2	BY MR. LANDAU: Q. You were personally involved in each one of
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1	BY MR. LANDAU:	1	to answer the question.
2	Q. And the attorney that was involved in that	2	BY MR. LANDAU:
3	transaction was Craig Galle; correct?	3	Q. We'll get to it in a little bit, but in the
4	MR. SALAZAR: Objection to relevance.	4	text messages that you produced
5	THE WITNESS: On advice of counsel, I'm	5	MR. MARIANI: Excuse me, Counsel.
6	exercising my rights under the Fifth Amendment and decline	6	MR. LANDAU: Yes.
7	to answer the question.	7	MR. MARIANI: Can I ask you not to point at
8	BY MR. LANDAU:	8	the witness?
9	Q. And Mr. Galle is Mr. Straub's attorney;	9	MR. LANDAU: I'm sorry, I apologize.
10	correct?	10	MR. MARIANI: Thank you.
11	MR. SALAZAR: Objection to form and	11	BY MR. LANDAU:
12	relevancy.	12	Q. In in the text messages that you
13	THE WITNESS: On advice of counsel, I'm	13	produced, they discuss that you've asked Mr. Straub if you
14	exercising my rights under the Fifth Amendment and decline	14	could if Mr. Galle, Craig Galle, could review certain
15	to answer the question.	15	documents for you; isn't that correct?
16	BY MR. LANDAU:	16	MR. SALAZAR: Object to form and relevancy.
17	Q. In fact, Mr. Straub was aware of that	17	THE WITNESS: On advice of counsel, I am
18	transaction; correct?	18	exercising my rights under the Fifth Amendment and decline
19	MR. SALAZAR: Same objection.	19	to answer the question.
20	THE WITNESS: On advice of counsel, I am	20	BY MR. LANDAU:
21	exercising my rights under the Fifth Amendment and decline	21	Q. And when Mr. Galle and Mr. Galle did, in
22	to answer the question.	22	fact, review documents for you; correct?
23	BY MR. LANDAU:	23	MR. SALAZAR: Same objection.
24	Q. Ms. Matthews, who is paying for Mr. Mariani	24	THE WITNESS: On advice of counsel, I'm
25	to be here today to represent you?	25	exercising my rights under the Fifth Amendment and decline
	Page 78		Page 80
1	Page 78	1	Page 80
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2	MR. SALAZAR: Objection to form and relevancy.	2	to answer the question. BY MR. LANDAU:
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	D 01		D 02
	Page 81		Page 83
1	MR. SALAZAR: Object to form, relevancy.	1	exercising my rights under the Fifth Amendment and decline
2	THE WITNESS: On the advice of counsel, I'm	2	to answer the question.
3	exercising my rights under the Fifth Amendment and decline		MR. LANDAU: What was wrong with the form?
4	to answer the question.	4	MR. SALAZAR: Again, you haven't established
5	BY MR. LANDAU:	5	any foundation for those questions.
6	Q. He's let you use a car; correct?	6	MR. LANDAU: I don't understand that.
7	MR. SALAZAR: Objection to form and	7	MR. SALAZAR: You haven't established
8	relevancy. THE WITNESS: On the advice of counsel, I'm	8	personal knowledge, you haven't established what
9	·	_	MR. LANDAU: Personal knowledge, I asked
10 11	exercising my rights under the Fifth Amendment and decline to answer the question.	10 11	have okay. BY MR. LANDAU:
12	MR. LANDAU: Let's I want to make sure we	12	Q. In fact, Ms. Matthews, isn't it true that
13	get this crystal straight. What's wrong with the form?	13	Mr. Straub has loaned a vehicle to your husband,
14	MR. SALAZAR: I think there is a lack of a	14	Robert Matthews, for his use?
15	predicate and	15	MR. SALAZAR: Same objection.
16	MR. LANDAU: Okay. Well, she's pleading the	16	THE WITNESS: On advice of counsel, I'm
17	Fifth	17	exercising my rights under the Fifth Amendment and decline
18	MR. SALAZAR: That doesn't mean you can	18	to answer the question.
19	just	19	BY MR. LANDAU:
20	MR. LANDAU: so the Court can draw a	20	Q. Has Mr. Straub ever let you use a credit
21	negative inference.	21	card of his?
22	MR. SALAZAR: Do what you want to do.	22	MR. SALAZAR: Objection to form and
23	MR. LANDAU: Okay.	23	relevancy.
24	MR. SALAZAR: I just don't think you've	24	THE WITNESS: On advice of counsel, I'm
25	established any type of predicate for your questions	25	exercising my rights under the Fifth Amendment and decline
	Page 87		Page 84
	Page 82		Page 84
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	Page 85		Page 87
1		,	
1	THE COURT REPORTER: 10.	1	Q. Is anything in Paragraph 12 not correct?
2	MR. GEORGE: 10.	2	MR. SALAZAR: Objection to form, relevancy.
3	MR. LANDAU: Let's go ahead and mark this as	3	THE WITNESS: On advice of counsel, I am
4	Exhibit 10.	4	exercising my rights under the Fifth Amendment and decline
5	(Thereupon, Exhibit Number 10 was marked for	5	to answer the question.
6	Identification.)	6	BY MR. LANDAU:
7	BY MR. LANDAU:	7	Q. In fact, everything in Paragraph 12 is true
8	Q. Ms. Matthews, the document that we have	8	and correct, isn't that true?
9	identified or marked as Exhibit 10, have you seen this	9	MR. SALAZAR: Same objection.
10	document before?	10	THE WITNESS: On advice of counsel, I'm
11	A. On advice of counsel, I'm exercising my	11	exercising my rights under the Fifth Amendment and decline
12	rights under the Fifth Amendment and decline to answer the	12	to answer the question.
13	question.	13	BY MR. LANDAU:
14	Q. Ms. Matthews, isn't it true that the	14	Q. Everything in this complaint is true and
15	document that we've marked as Exhibit 10 is a lawsuit	15	correct, isn't that true, Ms. Matthews?
16	where West Coast Investors, LLC is the plaintiff, and you	16	MR. SALAZAR: Form and relevancy objection.
17	and your husband are the defendants?	17	THE WITNESS: On advice of counsel, I am
18	MR. SALAZAR: Objection, relevancy.	18	exercising my rights under the Fifth Amendment and decline
19	THE WITNESS: On advice of counsel, I am	19	to answer the question.
20	exercising my rights under the Fifth Amendment and decline	20	BY MR. LANDAU:
21	to answer the question.	21	Q. Ms. Matthews, can you point out to us any
22	BY MR. LANDAU:	22	allegation in this complaint that is not true or correct?
23	Q. Do you know who West Coast Investors, LLC	23	MR. SALAZAR: Objection to form and
24	is?	24	relevancy.
25	A. On advice of counsel, I am exercising my	25	THE WITNESS: On advice of counsel, I am
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	Page 86		Page 88
1	Page 86 rights under the Fifth Amendment and decline to answer the	1	
1 2		1 2	Page 88 exercising my rights under the Fifth Amendment and decline to answer the question.
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Page 89 Page 91 of a loan dated May 28, 2018, of a hundred and fifty 1 BY MR. LANDAU: thousand dollars to Maria Matthews and Robert Matthews, do 2 2 Q. In fact, that loan was made to you; correct? 3 you see that? 3 A. On advice of counsel, I'm exercising my 4 4 rights under the Fifth Amendment and decline to answer the A. On advice of counsel, I'm exercising my 5 rights under the Fifth Amendment and decline to answer the 5 auestion. question. 6 MR. SALAZAR: Same objection. 6 7 Q. And on May 28, 2018, in fact, Mr. Straub, 7 BY MR. LANDAU: 8 8 through Palm Beach Polo, Inc., did loan you and your Q. That loan of a hundred and twenty-five husband a hundred and fifty thousand dollars; isn't that 9 thousand dollars to you, was that loan disclosed on your 10 correct? 10 husband's bankruptcy schedules? MR. SALAZAR: Objection, relevancy. 11 11 MR. SALAZAR: Same objection. THE WITNESS: On the advice of counsel, I'm 12 12 THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline 13 exercising my rights under the Fifth Amendment and decline 13 to answer the question. to answer the question. 14 14 MR. MARIANI: Excuse me for a second 15 15 BY MR. LANDAU: 16 counsel. (Confers with witness.) 16 Q. In fact, that loan was not disclosed on your 17 MR. LANDAU: Sure. 17 husband's bankruptcy schedules; isn't that true? MR. MARIANI: Go ahead. 18 MR. SALAZAR: Same objection. 18 19 19 BY MR. LANDAU: THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline Q. I'm sorry, I pointed again. That's a bad 20 20 21 habit. 21 to answer the question. 22 Ms. Matthews, you're aware your husband is 22 BY MR. LANDAU: 23 Q. Letter C, May 2018, unauthorized use of 23 currently in a Chapter 11 bankruptcy proceeding; correct? 24 A. On advice of counsel, I'm exercising my credit card claim, \$50,000. Do you see that? 24 25 rights under the Fifth Amendment and decline to answer the 25 A. On advice of counsel, I'm exercising my Page 90 Page 92 question. 1 rights under the Fifth Amendment and decline to answer the 1 2 Q. Ms. Matthews, the hundred and fifty thousand 2 question. 3 3 dollar loan that we just discussed on May 28, 2018 that's Q. So you did use Mr. Straub's credit cards to referred to in this Exhibit 1, do you know if that loan is 4 the tune of \$50,000 without his permission; correct? 5 5 disclosed in your husband's bankruptcy schedules? MR. SALAZAR: Objection, relevancy. MR. SALAZAR: Objection, relevancy. THE WITNESS: On the advice of counsel, I'm 6 6 7 THE WITNESS: On advice of counsel, I'm 7 exercising my rights under the Fifth Amendment and decline 8 exercising my rights under the Fifth Amendment and decline 8 to answer the question. 9 to answer the question. 9 BY MR. LANDAU: 10 10 BY MR. LANDAU: O. This unauthorized use of credit card claim, 11 \$50,000, what was that \$50,000 used for? 11 O. In fact, isn't it true that this loan is not 12 referenced in your husband's bankruptcy schedules? 12 MR. SALAZAR: Objection, relevancy. 13 MR. SALAZAR: Same objection. 13 THE WITNESS: On the advice of counsel, I'm 14 THE WITNESS: On the advice of counsel, I'm 14 exercising my rights under the Fifth Amendment and decline exercising my rights under the Fifth Amendment and decline to answer the question. 15 15 to answer the question. BY MR. LANDAU: 16 16 17 BY MR. LANDAU: 17 Q. That \$50,000 represents purchases made for Q. Letter B, June 1, 2018, loan to 18 the benefit of your husband, Robert Matthews; isn't that 18 Maria S. Matthews, a hundred twenty-five thousand dollars. 19 true? 19 20 Is that correct, was there a loan made on June 1, 2018, to 20 MR. SALAZAR: Objection, relevancy. 21 you of a hundred and twenty-five thousand dollars? 21 THE WITNESS: On advice of counsel, I'm 22 MR. SALAZAR: Objection, relevancy. 22 exercising my rights under the Fifth Amendment and decline 23 THE WITNESS: On the advice of counsel, I'm 23 to answer the question. exercising my rights under the Fifth Amendment and decline BY MR. LANDAU: 24 24 to answer the question. 25 Q. And those \$50,000 in purchases for the

	Page 93		Page 95
1	benefit of your husband were never disclosed to the	1	THE WITNESS: On the advice of counsel, I'm
2	Bankruptcy Court; correct?	2	exercising my rights under the Fifth Amendment and decline
3	MR. SALAZAR: Objection, relevancy.	3	to answer the question.
4	THE WITNESS: On the advice of counsel, I'm	4	BY MR. LANDAU:
5	exercising my rights under the Fifth Amendment and decline	5	Q. And if you flip to the second page of this
6	to answer the question.	6	agreement, that's your signature; correct? You signed
7	BY MR. LANDAU:	7	this agreement?
8	Q. Ms. Matthews, do you find this amusing?	8	MR. SALAZAR: Same objection.
9	A. On advice of counsel, I'm exercising my	9	THE WITNESS: On advice of counsel, I'm
10	rights under the Fifth Amendment and decline to answer the	10	exercising my rights under the Fifth Amendment and decline
11	question.	11 12	to answer the question.
12 13	Q. I'd ask you to flip to Exhibit 2.	12	BY MR. LANDAU:
14	Ms. Matthews, have you seen this document before? A. On advice of counsel, I'm exercising my	14	Q. I'd ask you to flip to the next page titled loan agreement.
15	rights under the Fifth Amendment and decline to answer the	15	MR. MARIANI: We have that in front of us.
16	question.	16	BY MR. LANDAU:
17	Q. In fact, Ms. Matthews, this this is a	17	Q. Have you seen this loan agreement before,
18	promissory note evidencing a loan from Palm Beach Polo,	18	Ms. Matthews?
19	LLC to yourself, Maria Matthews, for a hundred fifty	19	A. On the advice of counsel, I'm exercising my
20	thousand dollars; isn't that correct?	20	rights under the Fifth Amendment and decline to answer the
21	MR. SALAZAR: Objection, relevancy.	21	question.
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23	exercising my rights under the Fifth Amendment and decline	23	BY MR. LANDAU:
24	to answer the question.	24	Q. The signature under holder, that is your
25	BY MR. LANDAU:	25	signature; correct?
	Page 94		Page 96
1	Page 94 Q. And I'd ask you to flip to the next page,	1	Page 96 MR. SALAZAR: Objection, relevancy.
1 2	Q. And I'd ask you to flip to the next page, Page Number 2 of the promissory note. There is a	1 2	ŭ
	Q. And I'd ask you to flip to the next page, Page Number 2 of the promissory note. There is a signature at the bottom, and it seems to be your		MR. SALAZAR: Objection, relevancy. THE WITNESS: On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline
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	Page 97		Page 99
1	Q. And you've signed this document as seller;	1	MR. MARIANI: Yes, we have that.
2	correct?	2	BY MR. LANDAU:
3	A. On advice of counsel, I'm exercising my	3	Q. And, Ms. Matthews, I would ask if you've
4	rights under the Fifth Amendment and decline to answer the	4	ever seen this document that's at Exhibit F? Have you
5	question.	5	ever seen this document before?
6	MR. SALAZAR: Same objection.	6	A. On advice of counsel, I'm exercising my
7	BY MR. LANDAU:	7	rights under the Fifth Amendment and decline to answer the
8	Q. Do you understand what the purpose of this	8	question.
9	document is?	9	Q. In fact, you have seen this document before,
10	MR. SALAZAR: Objection, relevance.	10	haven't you?
11	THE WITNESS: On advice of counsel, I am	11	A. On advice of counsel, I'm exercising my
12	exercising my rights under the Fifth Amendment and decline	12	rights under the Fifth Amendment and decline to answer the
13	to answer the question.	13	question.
14 15	BY MR. LANDAU: Q. Through this document, if you look at	14	Q. And you have personal knowledge as to the contents of this document, do you not?
16	Paragraph 1, it appears to be that you are selling to	15 16	A. On advice of counsel, I'm exercising my
17	Palm Beach Polo, Inc. all of the personal property	17	rights under the Fifth Amendment and decline to answer the
18	described on Exhibit A to this agreement. Do you see	18	question.
19	that?	19	Q. Ms. Matthews, are there any transactions
20	MR. SALAZAR: Objection, relevancy.	20	identified in this document that are not accurate?
21	THE WITNESS: On advice of counsel, I'm	21	MR. SALAZAR: Object to form and relevance.
22	exercising my rights under the Fifth Amendment and decline	22	THE WITNESS: On advice of counsel, I'm
23	to answer the question.	23	exercising my rights under the Fifth Amendment and decline
24	BY MR. LANDAU:	24	to answer the question.
25	Q. Now, there's no Exhibit A. Can you tell us	25	BY MR. LANDAU:
	Page 98		Page 100
			r age 100
1	what Exhibit A was?	1	
1 2	what Exhibit A was? MR. SALAZAR: Objection, relevancy.	1 2	Q. In fact, isn't it true that every one of the transactions identified in this document are true and
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MR. SALAZAR: Objection, relevancy. THE WITNESS: On advice of counsel, I am exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. In fact, the purpose of this agreement, this whole loan agreement and security agreement, is to give Palm Beach Polo a lien on certain assets of yours; isn't that correct? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. SALAZAR: Objection, relevancy. MR. LANDAU: Oh, I think it's very relevant. BY MR. LANDAU: Q. Ms. Matthews, back to Exhibit 9, which is the Palm House, LLLP complaint. Let's flip to Exhibit F, F as in Frank. MR. SALAZAR: What is that document so I can try to find it? MR. LANDAU: It's a QuickBooks report. MR. MARIANI: Counselor, did you say	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. In fact, isn't it true that every one of the transactions identified in this document are true and accurate? MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Let's look at the first page of this document, Exhibit F. Oh, and I'm sorry, for the record, Exhibit F is a QuickBooks report. Ms. Matthews, isn't it correct that this document, Exhibit F, is a QuickBooks report illustrating transactions from a Regions checking account? MR. SALAZAR: Objection, relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. Okay, and I turn your attention to in the beginning, a handful of transactions down, there is a check on it's hard to read, it appears to be November 28, 2013, Check Number 1001, Trump International

	Page 101		Page 103
1	rights under the Fifth Amendment and decline to answer the	1	MR. LANDAU: John, if you can turn to I
2	question.	2	know it's hard to see the transactions dated May of
3	Q. Do you have use of the Trump International	3	2014?
4	Golf Club?	4	MR. MARIANI: Which one?
5	MR. SALAZAR: Objection to relevancy.	5	MR. LANDAU: And do you see where there's a
6	THE WITNESS: On advice of counsel, I'm	6	payment of a hundred fifty thousand dollars to
7	exercising my rights under the Fifth Amendment and decline		Lawrence Moens, it says consultant?
8	to answer the question.	8	MR. SALAZAR: What day is that, 5 what?
9	BY MR. LANDAU:	9	MR. LANDAU: It looks like 5/12/2014, and
10	Q. In November of 2013, you did, in fact, have	10	there's it looks like Check Number 1079.
11 12	use of the Trump International Golf Club; isn't that	11 12	MR. MARIANI: Say the amount again. MR. LANDAU: It looks to be a hundred fifty
13	right? MR. SALAZAR: Objection, relevancy.	13	thousand dollars even. Lawrence A. Moens Associates, Inc.
14	THE WITNESS: On advice of counsel, I'm	14	MR. MARIANI: Maybe you can find it.
15	exercising my rights under the Fifth Amendment and decline		MR. LANDAU: Yeah. I'm getting dizzy
16	to answer the question.	16	looking at this thing. Here it is. I'm going to circle
17	BY MR. LANDAU:	17	it.
18	Q. And this amount represents a transfer from	18	MR. MARIANI: No, don't circle it.
19	funds that belong to the EB-5 investors; isn't that	19	MR. LANDAU: Don't circle it? Right there.
20	correct?	20	MR. MARIANI: The 150.
21	MR. SALAZAR: Objection, relevancy.	21	MR. LANDAU: Yeah.
22	THE WITNESS: On advice of counsel, I'm	22	MR. MARIANI: I've pointed it out to the
23	exercising my rights under the Fifth Amendment and decline		witness.
24	to answer the question.	24	MR. LANDAU: Okay.
25	BY MR. LANDAU:	25	BY MR. LANDAU:
	Page 102		Page 104
1	Q. Same question for the next transaction,	1	Q. Ms. Matthews, this report suggests there was
2	November 26, 2013, Check Number it looks like 1002, the		
	, , ,	2	a payment made on May 10, 2014, Check Number, it looks
3	Mar-a-Lago Club, 13,000 and change.	3	a payment made on May 10, 2014, Check Number, it looks like, 1079, to Lawrence A. Moens, Associate Associates
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3 4	MR. SALAZAR: Same objection. BY MR. LANDAU: Q. In November of 2013, did you have use of the	3 4	like, 1079, to Lawrence A. Moens, Associate Associates Inc. for a hundred fifty thousand dollars.
3 4 5	MR. SALAZAR: Same objection. BY MR. LANDAU: Q. In November of 2013, did you have use of the Mar-a-Lago Club?	3 4 5	like, 1079, to Lawrence A. Moens, Associate Associates Inc. for a hundred fifty thousand dollars. Do you know what that payment was for?
3 4 5 6 7 8	MR. SALAZAR: Same objection. BY MR. LANDAU: Q. In November of 2013, did you have use of the Mar-a-Lago Club? MR. SALAZAR: Same objection.	3 4 5 6 7 8	like, 1079, to Lawrence A. Moens, Associate Associates Inc. for a hundred fifty thousand dollars. Do you know what that payment was for? A. On advice of counsel, I'm exercising my right under the Fifth Amendment and decline to answer the question.
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	Page 105		Page 107
1	payment?	1	BY MR. LANDAU:
2	MR. LANDAU: It looks to be May 12, 2014.	2	Q. Ms. Matthews, I'd refer your attention to
3	MR. GEORGE: Thank you.	3	Exhibit H.
4	MR. LANDAU: John, I'd ask you now, can you	4	MR. MARIANI: Is the first word on Exhibit H
5	point her to or do you want me to just find it, May 27,	5	Alibi, Ltd.?
6	2014?	6	MR. LANDAU: Yes, yes.
7	MR. MARIANI: You find it?	7	MR. MARIANI: We have it in front of the
8	MR. LANDAU: Sure.	8	witness.
9	MR. MARIANI: I don't know which way these	9	BY MR. LANDAU:
10	run.	10	Q. Ms. Matthews, can you tell us what Alibi,
11	MR. LANDAU: Let me find it.	11	Limited is?
12	MR. MARIANI: Say it again, May 27th?	12	A. On advice of counsel, I'm exercising my
13	MR. LANDAU: May 27, 2014, there's an ACH to		rights under the Fifth Amendment and decline to answer the
14	Bonaventure, it looks like 23, LLC, for \$1.1 million,	14	question.
15	right in the center of the page.	15	Q. And Alibi Alibi is the entity that you
16	MR. MARIANI: Right here or there?	16	used to purchase a yacht; isn't that correct?
17	MR. LANDAU: There.	17	MR. SALAZAR: Objection, relevancy.
18	MR. MARIANI: Okay. How much is it?	18	THE WITNESS: On advice of counsel, I'm
19	MR. LANDAU: 1.1 million.	19	exercising my rights under the Fifth Amendment and decline
20	MR. MARIANI: Okay.	20	to answer the question.
21	BY MR. LANDAU:	21	BY MR. LANDAU:
22	Q. Ms. Matthews, can you tell us what that	22	Q. And if you turn to the next page, it says
23	payment of \$1.1 million to Bonaventure 23, LLC, what that	23 24	certificate of incorporation. Do you see that?
24 25	payment was for?	25	MR. MARIANI: The page is in front of the witness.
23	MR. SALAZAR: Objection to form and	23	witness.
	Page 106		Page 108
1	relevancy. I believe it's Bonaventure 22, by the way.	1	BY MR. LANDAU:
2	MR. LANDAU: Is it 22, it could be?	2	Q. That's the document incorporating Alibi,
3	THE WITNESS: On advice of counsel, I'm	3	Limited in the Cayman Islands; correct?
4	exercising my rights under the Fifth Amendment and decline	4	MR. SALAZAR: Objection, form, relevancy.
5	to answer the question.	5	THE WITNESS: On advice of counsel, I'm
6	BY MR. LANDAU:	6	exercising my rights under the Fifth Amendment and decline
7	Q. In fact, Ms. Matthews, that's \$1.1 million	7	to answer the question.
8	of diverted funds from the EB-5 investors; isn't that	8	BY MR. LANDAU:
9	correct?	9	Q. And, in fact, you are the sole member of
10	MR. SALAZAR: Same objection, relevancy.	10	Alibi; isn't that correct?
11	THE WITNESS: On the advice of counsel, I'm	11	MR. SALAZAR: Objection, relevancy.
12 13	exercising my rights under the Fifth Amendment and decline to answer the question.	12 13	THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline
14	<u>=</u>		to answer the question.
15	MR. LANDAU: John, can you turn to Exhibit H?	14 15	to answer the question. BY MR. LANDAU:
16	MR. MARIANI: Is that after the Department	16	Q. Why would Alibi be in your name?
17	of State document?	17	A. On advice of counsel, I'm exercising my
18	MR. LANDAU: I believe so, yeah.	18	rights under the Fifth Amendment and decline to answer the
19	MR. GEORGE: Phil, can we take a break for a	19	question.
20	few minutes?	20	MR. SALAZAR: Objection, relevancy.
21	MR. LANDAU: Absolutely. I can actually use	21	BY MR. LANDAU:
22	a restroom break.	22	Q. Isn't it true that Alibi is in your name as
23	MR. MARIANI: Exhibit H, I have it.	23	a further vehicle to defraud and hinder the EB-5
24	(Thereupon, a brief recess was taken, after	24	investors?
25	which the following proceedings were had:)	25	MR. SALAZAR: Same objection.

	D 100		D 111
	Page 109		Page 111
1	THE WITNESS: On advice of counsel, I'm	1	MR. LANDAU: John, if we can turn to the
2	exercising my rights under the Fifth Amendment and decline		next document? It's the operating agreement of Alibi,
3	to answer the question.	3	LLC.
4	MR. LANDAU: John, if you'd flip further	4	MR. MARIANI: We have it in front of the
5	through it, I don't know if you want me to flip through	5	witness.
6	it, there's a certificate of formation of Alibi, LLC in	6	MR. LANDAU: And if you'd turn to Page 3 of
7	Delaware.	7	that document, it identifies Mia Matthews as the member.
8	MR. MARIANI: Does it have a page number on	8	Actually, go back. If you go to let's start at Page 2,
9	it?	9	under Article 2. Are you there?
	MR. LANDAU: It does not. The document	10	MR. MARIANI: It's in front of the witness,
11 12	right after it is the operating agreement of Alibi, LLC. MR. MARIANI: Meaning the memorandum of	11 12	yes. MR. SALAZAR: Is this what document are
13	association?	13	
14	MR. LANDAU: No, do you want me to	14	we looking at now? I'm sorry, I have not been able to
15	MR. MARIANI: It's later? Why don't you	15	locate it. Is it the Cayman Islands operating agreement? MR. LANDAU: No, the operating I think
16	find it?	16	this is the Delaware. It was right after the certificate
17	MR. LANDAU: Yeah, I'll flip through it for	17	of formation for Alibi, LLC.
18	you.	18	MR. MARIANI: Is there a question?
19	MR. MARIANI: It would have been nice if we	19	MR. LANDAU: Oh, I'm sorry, I thought Lou
20	had these marked with Post Its.	20	was asking
21	MR. LANDAU: Yeah. Well, we've been very	21	MR. SALAZAR: I'm sorry. I'm still trying
22	busy in this case. Here we go. Here it is. Got it.	22	to locate it, but please proceed.
23	MR. MARIANI: Okay. We have that in front	23	BY MR. LANDAU:
24	of the witness.	24	Q. Okay. So Article 2 John, are you there?
25	MR. SALAZAR: Do you know which exhibit that	25	MR. MARIANI: Yes.
	Page 110		Page 112
1	Page 110 is?	1	Page 112 BY MR. LANDAU:
1 2		1 2	
	is? MR. LANDAU: I want to make sure that the record is clear. I think this is part of Exhibit G or	1 2 3	BY MR. LANDAU:
2	is? MR. LANDAU: I want to make sure that the record is clear. I think this is part of Exhibit G or I think it's H, I just want to make sure that's right.	3 4	BY MR. LANDAU: Q. Article 2 identifies it says, the initial members shall be Mia S. Matthews. Do you see that? MR. MARIANI: Under Article 2?
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Page 113 Page 115 1 MR. LANDAU: Yeah, keep on going. Flip it you tell us what this document is? around, I think. There you go. Okay. Now, the document, 2 A. On advice of counsel, I'm exercising my the way you're holding it, above it or right before it, do 3 rights under the Fifth Amendment and decline to answer the 4 you see where it says Exhibit A? 4 auestion. 5 5 MR. MARIANI: Well, I see ---Q. And I'm referring to the page, and 6 MR. LANDAU: Photographic -- I'm going to 6 unfortunately they're not numbered, but there's the 7 refer to both of them. They go together. 7 picture, there's the page that has a picture of you, and 8 MR. MARIANI: The typed Exhibit A, 8 then the following page it says, Mia S. Matthews, photographic identification? 9 9 principal. 10 MR. LANDAU: Correct. 10 John, are we there? MR. MARIANI: Yes, we have that page. 11 MR. MARIANI: I have that page. 11 12 BY MR. LANDAU: 12 MR. LANDAU: And, again, this is part of Q. Ms. Matthews, have you seen this document 13 Exhibit H. 13 before? 14 BY MR. LANDAU: 14 15 15 A. On advice of counsel, I'm exercising my Q. And Ms. Matthews, this was marketing rights under the Fifth Amendment and decline to answer the 16 material that was presented to the EB-5 investors; isn't 16 17 question. 17 that correct? 18 Q. And the identification provided, and it 18 A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the 19 looks like it's handwritten Exhibit A, is on a copy of 19 20 your passport; correct? 20 question. 21 A. On advice of counsel, I'm exercising my 21 Q. And it identifies you as a principal of the 22 rights under the Fifth Amendment and decline to answer the 22 Palm House Hotel; isn't that correct? 23 MR. SALAZAR: Objection to form and 23 question. 24 24 MR. LANDAU: John, if you can flip a few relevancy. 25 THE WITNESS: On advice of counsel, I'm 25 more pages, there's a brochure with Mia's picture on it. Page 114 Page 116 Yep, and it has her name. Are you there? exercising my rights under the Fifth Amendment and decline 1 2 MR. MARIANI: Well, I see this page. to answer the question. 2 MR. LANDAU: Yes, okay, and above it --3 3 BY MR. LANDAU: yeah, it looks to be a picture. 4 4 Q. And, in fact, you were never a principal of 5 BY MR. LANDAU: 5 the Palm House Hotel; isn't that correct? 6 Q. Ms. Matthews, this is a further part of 6 A. On advice of counsel, I'm exercising my Exhibit H, and it looks to be a picture of you, and on top 7 7 rights under the Fifth Amendment and decline to answer the 8 of it, it says Palm House, Palm Beach. Do you see that? 8 question. 9 A. On advice of counsel, I am exercising my 9 Q. This is a further lie that was presented to rights under the Fifth Amendment and decline to answer the 10 the EB-5 investors; isn't that true? 10 A. On advice of counsel, I'm exercising my 11 auestion. 11 12 Q. You're not going to identify your 12 rights under the Fifth Amendment and decline to answer the 13 13 auestion. photograph? 14 A. On the advice of counsel, I'm exercising my 14 Q. Ms. Matthews, can you explain why this rights under the Fifth Amendment and decline to answer the 15 document purports to be marketing material with your name 15 16 auestion. 16 as principal on it? 17 Q. So that's not your picture? The picture --17 A. On advice of counsel, I'm exercising my the page that your attorney is holding in front of you, 18 rights under the Fifth Amendment and decline to answer the 18 that -- that is, in fact, your picture; correct? 19 question. 19 A. On the advice of counsel, I'm exercising my 20 20 MR. LANDAU: John, if you can flip like two rights under the Fifth Amendment and decline to answer the more pages forward. You'll see there are -- there's a 21 21 22 22 letter from Hospitality Investors Group. Are you there? question. 23 MR. SALAZAR: Objection, relevancy. Sorry. 23 MR. MARIANI: Yes. MR. LANDAU: At the top it says, Exhibit B, 24 BY MR. LANDAU: 24 25 professional reference. 25 O. Ms. Matthews, what is this document? Can

	Page 117		Page 119
1	MR. MARIANI: Yes.	1	BY MR. LANDAU:
2	BY MR. LANDAU:	2	Q. Ms. Matthews, can you tell us what this
3	Q. Ms. Matthews, can you tell us what this	3	document is?
4	document is?	4	A. On advice of counsel, I'm exercising my
5	A. On advice of counsel, I'm exercising my	5	rights under the Fifth Amendment and decline to answer the
6	rights under the Fifth Amendment and decline to answer the	6	question.
7	question.	7	Q. In fact, it's a document to open an account
8	Q. For what purpose would Frank Orenstein of	8	at Regions Bank; isn't that correct?
9	Hospitality Investors Group be providing a reference on	9	A. On advice of counsel, I'm exercising my
10	your behalf?	10	rights under the Fifth Amendment and decline to answer the
11	MR. SALAZAR: Objection, relevancy.	11	question.
12	THE WITNESS: On advice of counsel, I'm	12	Q. And if you look further down towards the
13	exercising my rights under the Fifth Amendment and decline	13	middle of it, it identifies you as the director of
14	to answer the question.	14	Alibi, Ltd.; correct?
15	MR. LANDAU: Can we turn to the next page,	15	A. On advice of counsel, I'm exercising my
16	and that page is another reference letter from Regions	16	rights under the Fifth Amendment and decline to answer the
17	Bank?	17	question.
18	John, do you have it?	18	Q. And it further identifies authorized signers
19	MR. MARIANI: There's a Regions Exhibit C,	19	of Jennifer Hue (phonetic) and Edward Snowden; isn't that
20	financial reference.	20	correct?
21	MR. LANDAU: Yes, that's it.	21	A. On advice of counsel, I'm exercising my
22	BY MR. LANDAU:	22 23	rights under the Fifth Amendment and decline to answer the
23 24	Q. Ms. Matthews, have you seen this document before?	23 24	question. MR. SALAZAR: Objection to relevancy.
25	A. On the advice of counsel, I'm exercising my	25	BY MR. LANDAU:
23	A. On the advice of counsel, I'm exclessing my	23	BT MR. LANDAU.
	Page 118		Page 120
1	rights under the Fifth Amendment and decline to answer the	1	Q. Jennifer Hue is or was Bob Matthews'
2	question.	2	assistant; correct?
3	Q. And can you explain for what purpose a	3	A. On advice of counsel, I'm exercising my
4	reference letter was being provided on your behalf from	4	rights under the Fifth Amendment and decline to answer the
5	Regions Bank?	5	question.
6	A. On advice of counsel, I'm exercising my	6	Q. And Edward Snowden was the captain of the
7	rights under the Fifth Amendment and decline to answer the		yacht; correct?
8 9	question. MR. LANDAU: And, John, a few more pages	8 9	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the
10	forward, it's the last exhibit last page of Exhibit H,	10	question.
11	right before it says Exhibit I.	11	MR. LANDAU: John, can you turn to the next
12	MR. MARIANI: What's it look like?	12	page? Top of it says account package. I think you went
13	MR. LANDAU: (Indicating.)	13	the wrong way again.
14	MR. SALAZAR: May I see?	14	MR. MARIANI: Oh. I don't think so.
15	MR. LANDAU: (Indicating.)	15	Exhibit I?
16	MR. MARIANI: Okay. I have the last page.	16	MR. LANDAU: Part of Exhibit I.
17	The heading is Regions authorization of corporation?	17	MR. MARIANI: Okay. The first page
	ا		MR. LANDAU: Oh, it is yes, yes,
18	MR. LANDAU: Correct.	18	1711C. Dili 1811C. Oli, 16 15 9 CS, 9 CS,
18 19	MR. LANDAU: Correct. MR. MARIANI: Those are the first three	18 19	Exhibit I.
19	MR. MARIANI: Those are the first three	19	Exhibit I.
19 20	MR. MARIANI: Those are the first three words of the description.	19 20	Exhibit I. MR. MARIANI: So it is the first page of
19 20 21	MR. MARIANI: Those are the first three words of the description. MR. LANDAU: Yeah, the full title is authorization of corporation, partnership, association or other entity to utilize deposit or fee-based services.	19 20 21 22 23	Exhibit I. MR. MARIANI: So it is the first page of Exhibit I? MR. LANDAU: Yes, and the title is account package, non-personal checking/savings services.
19 20 21 22	MR. MARIANI: Those are the first three words of the description. MR. LANDAU: Yeah, the full title is authorization of corporation, partnership, association or	19 20 21 22	Exhibit I. MR. MARIANI: So it is the first page of Exhibit I? MR. LANDAU: Yes, and the title is account

	Page 121		Page 123
1	BY MR. LANDAU:	1	MR. SALAZAR: Objection, relevancy.
2	Q. Okay, and Ms. Matthews, have you seen this	2	THE WITNESS: On advice of counsel, I'm
3	document before?	3	exercising my rights under the Fifth Amendment and decline
4	A. On advice of counsel, I'm exercising my	4	to answer the question.
5	rights under the Fifth Amendment and decline to answer the	5	BY MR. LANDAU:
6	question.	6	Q. Any of the monies that flowed through Alibi,
7	Q. In fact, it's another account opening	7	Ltd., did you pay income taxes on those monies?
8	document from Regions Bank, isn't it?	8	MR. SALAZAR: Objection, relevancy.
9	A. On advice of counsel, I'm exercising my	9	THE WITNESS: On advice of counsel, I'm
10	rights under the Fifth Amendment and decline to answer the	10	exercising my rights under the Fifth Amendment and decline
11	question.	11	to answer the question.
12	Q. And it's through the through this	12	BY MR. LANDAU:
13	document you were opening an account for Alibi Ltd.;	13	Q. On any of the monies that flowed through
14	correct?	14	Alibi, Ltd., did creditors of 160 Royal Palm, LLC get any
15	MR. SALAZAR: Objection to relevancy again.	15	benefit from those funds?
16	THE WITNESS: On advice of counsel, I'm	16	MR. SALAZAR: Objection to form and
17	exercising my rights under the Fifth Amendment and decline		relevancy.
18	to answer the question.	18	THE WITNESS: On advice of counsel, I'm
19	BY MR. LANDAU:	19	exercising my rights under the Fifth Amendment and decline
20	Q. At the bottom, that's your signature,	20	to answer the question. BY MR. LANDAU:
21 22	correct, where it says Maria Matthews, director? MR. SALAZAR: Objection, relevancy.	21 22	Q. Isn't it true that creditors received no
23	THE WITNESS: On advice of counsel, I am	23	benefit from funds deposited in this Regions Alibi, Ltd.
24	exercising my rights under the Fifth Amendment and decline		account?
25	to answer the question.	25	MR. SALAZAR: Objection to form and
23	to answer the question.	23	Wirk. Statistics. Collection to form and
	Page 122		Page 124
1	Page 122 MR. LANDAU: And here is the relevancy, Lou.	1	Page 124 relevancy.
1 2		1 2	relevancy. THE WITNESS: On advice of counsel, I'm
	MR. LANDAU: And here is the relevancy, Lou. BY MR. LANDAU: Q. Ms. Matthews, why don't you read to us what		relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline
2 3 4	MR. LANDAU: And here is the relevancy, Lou. BY MR. LANDAU: Q. Ms. Matthews, why don't you read to us what the address is?	2 3 4	relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.
2 3 4 5	MR. LANDAU: And here is the relevancy, Lou. BY MR. LANDAU: Q. Ms. Matthews, why don't you read to us what the address is? MR. MARIANI: Objection, form. The document	2 3 4 5	relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. LANDAU: John, can you turn to Exhibit
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2 3 4 5 6 7 8 9 10 11 12	MR. LANDAU: And here is the relevancy, Lou. BY MR. LANDAU: Q. Ms. Matthews, why don't you read to us what the address is? MR. MARIANI: Objection, form. The document speaks I'm going to direct the witness not to read from the document. MR. LANDAU: Okay. BY MR. LANDAU: Q. Isn't it true that the address says 160 Royal Palm Way, Palm Beach, Florida? MR. SALAZAR: Objection, relevancy.	2 3 4 5 6 7 8 9 10 11 12	relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. LANDAU: John, can you turn to Exhibit N, as in Nancy? MR. MARIANI: Is that near the back of the document? MR. LANDAU: It is, yes. MR. GEORGE: And what is it, Phil? MR. MARIANI: About how many pages? Yeah, what is it?
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	Page 125		Page 127
1	the witness.	1	BY MR. LANDAU:
2	BY MR. LANDAU:	2	Q. So, Ms. Matthews, this document that we've
3	Q. Okay, and the document that's in front of	3	identified as Exhibit 11, is a checking account register
4	the witness is a letter from the Law Firm of Weiss Handler	4	for Palm House Hotel, LLLP.
5	& Cornwell to Robert and Mia Matthews, and specifically it	5	MR. MARIANI: May I ask what the case number
6	shows that it was e-mailed to Mia Matthews at me.com.	6	refers to on Page 1 and Page 2?
7	Do you see that, Ms. Matthews?	7	MR. LANDAU: This is the bankruptcy case of
8	MR. MARIANI: That's in front of the	8	160 Royal Palm, LLC.
9	witness.	9	MR. MARIANI: Thank you. Is this part of a
10	MR. LANDAU: Okay.	10	larger document in that case?
11	MR. MARIANI: Do you have a question about	11	MR. LANDAU: It is, it is an exhibit
12	the document?	12	MR. MARIANI: To what?
13	MR. LANDAU: Yes.	13	MR. LANDAU: to either our motion to
14	BY MR. LANDAU:	14	limit credit bid or a notice of a filing related to that
15	Q. Ms. Matthews, have you seen this document	15	motion.
16	before?	16	MR. MARIANI: Okay. Just one last question.
17	A. On advice of counsel, I'm exercising my	17	Can you tell me what Document 163 is?
18	rights under the Fifth Amendment and decline to answer the	18	MR. LANDAU: That's what I'm saying, it's
19	question.	19	either do you
20	Q. And, in fact, isn't it correct that this	20 21	MR. GEORGE: This is, I believe, KK-PB's
21	letter is making demand on you for over \$16 million that was diverted from the Palm House Hotel project?	21	response in opposition to the motion for credit bid.
22 23	A. On advice of counsel, I'm exercising my	23	MR. LANDAU: Oh, this is okay. MR. SALAZAR: No.
24	rights under the Fifth Amendment and decline to answer the	24	MR. LANDAU: No?
25	question.	25	MR. SALAZAR: I wouldn't have attached this,
23	question.	23	Wix. STEPLETX. I wouldn't have attached tills,
	Page 126		Page 128
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Page 129 Page 131 prepared? certain he was coming. 1 2 THE COURT REPORTER: Are we on the record? 2 MR. LANDAU: I prepared the exhibit. The 3 MR. SALAZAR: No. sorry. 3 actual documents were received in discovery. 4 MR. LANDAU: Sorry, yeah. 4 MR. MARIANI: Go ahead, please. 5 5 (Off the record.) BY MR. LANDAU: 6 MR. MARIANI: Counsel that is questioning 6 Q. Ms. Matthews, the document that we've marked 7 you has represented that this document is part of a filing 7 for identification purposes as Exhibit Number 12, have you 8 that he made in the bankruptcy proceeding for 160. 8 seen this document before? MR. LANDAU: Correct, it's ECF Number 163, 9 9 A. On advice of counsel, I'm exercising my and this would be Exhibit Number 3 to that filing. 10 rights under the Fifth Amendment and decline to answer the 10 MR. MARIANI: And you're going to identify question. 11 11 12 what that was a little bit later? 12 Q. All right, and, in fact, these are monies 13 MR. LANDAU: Correct, yes. 13 that were transferred from Palm House Hotel, LLLP to the 14 MR. MARIANI: So go ahead and ask your 14 Craig Galle law firm trust account; isn't that correct? 15 MR. SALAZAR: Object on form. 15 questions. THE WITNESS: On advice of counsel, I'm BY MR. LANDAU: 16 16 Q. Ms. Matthews, have you -- have you seen this 17 17 exercising my rights under the Fifth Amendment and decline document before? 18 to answer the question. 18 19 19 A. On advice of counsel, I'm exercising my BY MR. LANDAU: rights under the Fifth Amendment and decline to answer the 20 20 Q. And, Ms. Matthews, you had, at the time 21 question. 21 these transactions were recorded, personal knowledge of 22 Q. In fact, this document represents a check 22 each of the transactions; isn't that correct? register for Palm House Hotel, LLLP; correct? 23 MR. SALAZAR: Same objection. 23 A. On advice of counsel, I'm exercising my 24 THE WITNESS: On advice of counsel, I'm 24 25 rights under the Fifth Amendment and decline to answer the 25 exercising my rights under the Fifth Amendment and decline Page 130 Page 132 question. 1 to answer the question. 1 2 Q. And, Ms. Matthews, you have personal 2 MR. GEORGE: Excuse me. Document 163 is the knowledge as to each of the transfers listed in this 3 3 opposition and response to the motion to estimate claim exhibit; correct? for purchase of credit bidding filed by Creditor KK-PB 4 4 5 MR. SALAZAR: Object to form. 5 Financial, LLC, which was filed by the debtor, 160 Royal THE WITNESS: On advice of counsel, I'm 6 6 Palm, LLC, and it was filed on October 17, 2018. 7 exercising my rights under the Fifth Amendment and decline 7 MR. LANDAU: So just to be clear, that was 8 to answer the question. 8 the debtor's response to KK-PB's motion to estimate claim. 9 BY MR. LANDAU: 9 MR. MARIANI: And you're the debtor? 10 MR. LANDAU: Correct, I represent the 10 O. And each of the transfers identified in this exhibit are true and correct, and actually happened; yes? 11 11 debtor. 12 MR. SALAZAR: Objection to form and 12 MR. MARIANI: Continue with your 13 relevancy. 13 questioning. 14 14 THE WITNESS: On advice of counsel, I'm Thank you, David. expressing -- exercising my rights under the Fifth 15 MR. GEORGE: You're welcome. 15 BY MR. LANDAU: 16 Amendment and decline to answer the question. 16 17 MR. LANDAU: Now we'll mark this as 12. 17 Q. Ms. Matthews, does this exhibit represent (Thereupon, Exhibit Number 12 was marked for 18 funds that were diverted from the Palm House Hotel 18 19 Identification.) 19 project? 20 20 MR. MARIANI: Again, counsel, this is a MR. SALAZAR: Objection, form. THE WITNESS: On advice of counsel, I'm document you filed as an exhibit? 21 21 22 MR. LANDAU: Correct. This is Exhibit 5 to 22 exercising my rights under the Fifth Amendment and decline 23 the filing at ECF Number 163 in the bankruptcy case of 23 to answer the question. 160 Royal Palm, LLC. BY MR. LANDAU: 24 24 25 25 MR. MARIANI: Is this a document you Q. In fact, isn't it true that this document

Page 133 1 represents funds that were diverted from the Palm House 2 Hotel project? 3 MR. SALAZAR: Objection, form. 4 THE WITNESS: On advice of counsel, I'm 5 exercising my rights under the Fifth Amendment and decline 6 to answer the question. 7 BY MR. LANDAU: 8 Q. Ms. Matthews, do you know if at the time 9 these transfers were made, was the debtor, 160 Royal Palm, 10 LLC LLC insolvent? 11 MR. SALAZAR: Just a moment. 12 THE WITNESS: On advice of counsel, I'm 13 eversising my rights under the Fifth Amendment and decline 14 rights under the Fifth Amendment and decline to answer 2 question. 3 Q. Where it says Evans IOLTA, Evans refers to 4 Les Evans; correct? 5 A. On advice of counsel, I'm exercising my 6 rights under the Fifth Amendment and decline to answer 7 question. 8 Q. And Les Evans, at the time, was counsel for 9 the debtor, 160 Royal Palm, LLC; isn't that correct? 10 MR. SALAZAR: Objection to form. 11 THE WITNESS: On advice of counsel, I'm 12 exercising my rights under the Fifth Amendment and decline 13 to energy the greation. 14 Les Evans; correct? 15 A. On advice of counsel, I'm exercising my 16 rights under the Fifth Amendment and decline to answer 17 question. 18 Q. And Les Evans, at the time, was counsel for 19 the debtor, 160 Royal Palm, LLC; isn't that correct? 10 MR. SALAZAR: Objection to form. 11 THE WITNESS: On advice of counsel, I'm 12 exercising my rights under the Fifth Amendment and decline 13 to energy the greation.	
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11 MR. SALAZAR: Just a moment. 11 THE WITNESS: On advice of counsel, I'm 12 THE WITNESS: On advice of counsel, I'm 12 exercising my rights under the Fifth Amendment and dec	
THE WITNESS: On advice of counsel, I'm 12 exercising my rights under the Fifth Amendment and dec	
	line
13 exercising my rights under the Fifth Amendment and decline 13 to answer the question.	
14 to answer the question. 14 BY MR. LANDAU:	
15 MR. SALAZAR: Never mind. 16 BY MR. LANDAU: 16 Can you tell us what those transfers were for?	
16 BY MR. LANDAU: 17 Q. At the time each of these transactions were 18 can you tell us what those transfers were for? 19 A. On advice of counsel, I'm exercising my	
18 made, isn't it true that the debtor, 160 Royal Palm, LLC, 18 rights under the Fifth Amendment and decline to answer	the
19 was, in fact, insolvent? 19 question.	ше
20 MR. SALAZAR: Objection to form. 20 Q. And, in fact, isn't it accurate, that those	
21 THE WITNESS: On advice of counsel, I'm 21 transfers were diverted EB-5 investor funds?	
22 exercising my rights under the Fifth Amendment and decline 22 MR. SALAZAR: Object on relevancy.	
23 to answer the question. 23 THE WITNESS: On advice of counsel, I'm	
24 BY MR. LANDAU: 24 exercising my rights under the Fifth Amendment and dec	line
Q. Isn't it true that as a result of each of 25 to answer the question.	
	4
Page 134 Page	136
1 these transfers being made, they rendered the debtor, 1 BY MR. LANDAU:	
2 160 Royal Palm, LLC, insolvent? 2 Q. And at the time of those transfers, you were	
3 MR. SALAZAR: Objection to form. 3 consulting with Glenn Straub; isn't that correct?	
4 THE WITNESS: On advice of counsel, I'm 4 MR. SALAZAR: Object to form	
5 exercising my rights under the Fifth Amendment and decline 5 THE WITNESS: On advice	
6 to answer the question. 6 MR. SALAZAR: relevancy.	
7 BY MR. LANDAU: 7 THE WITNESS: Pardon me. On advice of	
8 Q. Ms. Matthews, if you look towards the middle 9 of this document, it refers to transfers, it says Evans 9 Amendment and decline to answer the question.	
9 of this document, it refers to transfers, it says Evans 10 IOLTA. 9 Amendment and decline to answer the question. 10 BY MR. LANDAU:	
11 MR. MARIANI: Which page are you on in the 11 Q. And Glenn Straub had specific knowledge as	
12 document? 12 to your involvement with the Palm House Hotel at that	
13 MR. LANDAU: So up top it says Page 2 of 5. 13 time; isn't that correct?	
MR. MARIANI: And you're looking at the 14 MR. SALAZAR: Objection, form.	
15 middle? 15 THE WITNESS: On advice of counsel, I'm	
MR. LANDAU: Yes. 16 exercising my rights under the Fifth Amendment and dec	line
MR. MARIANI: April 15, 2013, is that the 17 to answer the question.	
18 middle? 18 BY MR. LANDAU:	
MR. LANDAU: Correct, correct. 19 Q. If you go to the last entry, it says Evans	
MR. MARIANI: So your question again? 20 IOLTA, and it shows a decrease of roughly \$9.2 million.	
21 BY MR. LANDAU: 21 Do you see that?	
Q. So my question is: Each of those transfers 22 A. On advice of counsel, I'm exercising my	
23 involving the Evans IOLTA account, can you identify what 23 rights under the Fifth Amendment and decline to answer	the
24 those transfers were for? 24 question.	
25 A. On advice of counsel, I'm exercising my 25 Q. Ms. Matthews, can you explain where those	

	Page 137		Page 139
1	\$9.2 million went?	1	
1		1	document represents an accounting of the trust account of,
2 3	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the	2	it says Matthews PO Palm House, that was being held by Les Evans?
4	question.	4	MR. SALAZAR: Objection, form.
5	Q. Isn't it true that those funds, those	5	THE WITNESS: On advice of counsel, I'm
6	\$9.2 million, represent diverted EB-5 monies?	6	exercising my rights under the Fifth Amendment and decline
7	MR. SALAZAR: Objection to form.	7	to answer the question.
8	THE WITNESS: On advice of counsel, I'm	8	BY MR. LANDAU:
9	exercising my rights under the Fifth Amendment and decline		Q. And just so we're crystal clear, the
10	to answer the question.	10	document that we have in front of us is Exhibit 5 to
11	BY MR. LANDAU:	11	Docket Entry 163 in the 160 Royal Palm bankruptcy case?
12	Q. Isn't it true that those \$9.2 million,	12	A. On advice of counsel, I'm exercising my
13	160 Royal Palm received no benefit from those funds?	13	rights under the Fifth Amendment and decline to answer the
14	MR. SALAZAR: Object to form.	14	question.
15	THE WITNESS: On the advice of counsel, I'm	15	Q. Ms. Matthews, I'd ask you to turn to the
16	exercising my rights under the Fifth Amendment and decline		last page of this exhibit, 5 of 5.
17	to answer the question.	17	MR. MARIANI: The page is in front of the
18	BY MR. LANDAU:	18	witness.
19	Q. Isn't it correct that those funds were used	19	BY MR. LANDAU:
20	for purposes other than the business purposes of 160 Royal	20	Q. Can you explain to us the first transfer,
21	Palm, LLC?	21	\$266,064.60, to the Tax Collector of Palm Beach County?
22	MR. SALAZAR: Objection to form.	22	MR. SALAZAR: Objection, relevancy.
23	THE WITNESS: On advice of counsel, I'm	23	THE WITNESS: On advice of counsel, I'm
24	exercising my rights under the Fifth Amendment and decline		exercising my rights under the Fifth Amendment and decline
25	to answer the question.	25	to answer the question.
	Page 138		Page 140
1		1	
1 2	BY MR. LANDAU:	1 2	BY MR. LANDAU:
2	BY MR. LANDAU: Q. And isn't it correct that you did not pay	2	BY MR. LANDAU: Q. Isn't it true that that was a payment of
	BY MR. LANDAU: Q. And isn't it correct that you did not pay federal income taxes on any of those \$9.2 million?		BY MR. LANDAU: Q. Isn't it true that that was a payment of property taxes on your personal residence?
2 3	BY MR. LANDAU: Q. And isn't it correct that you did not pay	2 3	BY MR. LANDAU: Q. Isn't it true that that was a payment of
2 3 4	BY MR. LANDAU: Q. And isn't it correct that you did not pay federal income taxes on any of those \$9.2 million? MR. SALAZAR: Objection, form and relevancy.	2 3 4	BY MR. LANDAU: Q. Isn't it true that that was a payment of property taxes on your personal residence? MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm
2 3 4 5	BY MR. LANDAU: Q. And isn't it correct that you did not pay federal income taxes on any of those \$9.2 million? MR. SALAZAR: Objection, form and relevancy. THE WITNESS: On advice of counsel, I'm	2 3 4 5	BY MR. LANDAU: Q. Isn't it true that that was a payment of property taxes on your personal residence? MR. SALAZAR: Same objection.
2 3 4 5 6	BY MR. LANDAU: Q. And isn't it correct that you did not pay federal income taxes on any of those \$9.2 million? MR. SALAZAR: Objection, form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline	2 3 4 5 6	BY MR. LANDAU: Q. Isn't it true that that was a payment of property taxes on your personal residence? MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	BY MR. LANDAU: Q. And isn't it correct that you did not pay federal income taxes on any of those \$9.2 million? MR. SALAZAR: Objection, form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. LANDAU: John, let's flip to the next document. MR. SALAZAR: Page number? MR. LANDAU: Page 3 of 5, and 4 of 5, and 5 of 5, the last three pages. MR. SALAZAR: I'm sorry, 3 of 5 is where we're at right now? MR. LANDAU: Yes. MR. MARIANI: That page is in front of the witness. MR. LANDAU: Okay. BY MR. LANDAU: Q. Ms. Matthews, can you tell us what this document is? A. On advice of counsel, I'm exercising my	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	BY MR. LANDAU: Q. Isn't it true that that was a payment of property taxes on your personal residence? MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. And then below that, Ms. Matthews, there are three payments, it looks like wires, to Dovenmuehle, D-o-v-e-n-m-u-e-h-l-e, Dovenmuehle Mortgage, Inc. Do you see those? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. Well, you see them, yes? Those are in front of you? MR. MARIANI: That page is before the witness. MR. LANDAU: Okay. BY MR. LANDAU: Q. And can you explain why those payments are

	Page 141		Page 142
	Page 141		Page 143
1	question.	1	documents that are in front of Ms. Matthews are Bates
2	Q. In fact, those are further funds being	2	Numbered 523, 524, 525, 527 and 528, 526 is missing.
3	diverted from the EB-5 investors and being diverted from 160 Royal Palm, LLC; isn't that correct?	3	MR. MARIANI: So are you going to leave the exhibit like that?
4 5	MR. SALAZAR: Object to form.	5	MR. LANDAU: Sure.
6	THE WITNESS: On advice of counsel, I'm	6	MR. MARIANI: Okay, and can you make a
7	exercising my rights under the Fifth Amendment and decline	7	representation of whose Bates numbers those are?
8	to answer the question.	8	MR. LANDAU: These, I believe, are documents
9	BY MR. LANDAU:	9	that were produced by Mr. Galle.
10	Q. And the same question with the \$92,700	10	MR. MARIANI: Can we make sure the record
11	payment to Deutsche Bank on March 4, 2014.	11	shows there's no 526 in this exhibit, so later on
12	MR. MARIANI: What is the question?	12	nobody
13	BY MR. LANDAU:	13	MR. LANDAU: Sure.
14	Q. What do those funds represent?	14	MR. MARIANI: looks for it?
15	A. On advice of counsel, I'm exercising my	15	MR. LANDAU: Yep.
16	rights under the Fifth Amendment and decline to answer the	16	BY MR. LANDAU:
17	question.	17	Q. Ms. Matthews, the document that has been
18	Q. In fact, isn't it a payment on the mortgage	18	identified as Exhibit Number 13, have you seen this
19 20	of your personal home?	19 20	document before?
21	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the	21	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the
22	question.	22	question.
23	Q. So you're refusing to answer a question	23	Q. And, in fact, this document in this
24	regarding the finances of 160 Royal Palm, LLC; isn't that	24	document, your husband, Bob Matthews, is asking
25	correct?	25	Craig Galle to prepare a legal document with regard to the
	Page 142		D 144
			Page 144
1	MR. SALAZAR: Objection to form.	1	foreclosure auction of the home in at 115 Lower Church
2	MR. SALAZAR: Objection to form. THE WITNESS: On advice of counsel, I'm	2	foreclosure auction of the home in at 115 Lower Church Hill in Connecticut; isn't that correct?
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2 3 4 5	MR. SALAZAR: Objection to form. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. LANDAU: What are we up to?	2 3 4 5	foreclosure auction of the home in at 115 Lower Church Hill in Connecticut; isn't that correct? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline
2 3 4 5 6	MR. SALAZAR: Objection to form. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. LANDAU: What are we up to? THE COURT REPORTER: 13.	2 3 4 5 6	foreclosure auction of the home in at 115 Lower Church Hill in Connecticut; isn't that correct? MR. SALAZAR: Object to form and relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.
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Page 145 Page 147 THE WITNESS: On advice of counsel, I'm 1 1 through MM00105. exercising my rights under the Fifth Amendment and decline 2 MR. SALAZAR: Counsel, just for the record, to answer the question. 3 we have not received a copy of this. If you'd provide 4 BY MR. LANDAU: 4 that right away, we'd appreciate it. 5 Q. In fact, isn't it true that what's being 5 MR. LANDAU: These absolutely were provided. 6 done here by Mr. Galle, is exactly the same activity and These are -- these are documents that were produced by 6 7 actions as Mr. Evans took to further the fake or friendly 7 Ms. Matthews. 8 8 foreclosure that took place in Connecticut? MR. SALAZAR: I know, but I don't think we MR. SALAZAR: Objection to form. 9 9 got a copy. THE WITNESS: On advice of counsel, I'm 10 10 MR. LANDAU: It's in the Dropbox. exercising my rights under the Fifth Amendment and decline 11 MR. SALAZAR: Which Dropbox? 11 to answer the question. 12 12 MR. LANDAU: However they were ---BY MR. LANDAU: 13 MR. SALAZAR: We got some earlier ones but 13 14 Q. To your knowledge, has Mr. Galle been 14 not this one -- maybe. indicted yet? 15 15 BY MR. LANDAU: MR. SALAZAR: Objection to form. Q. Ms. Matthews, can you please identify the 16 16 17 THE WITNESS: On the advice of counsel, I'm 17 document that's been marked exhibit -- Composite exercising my rights under the Fifth Amendment and decline 18 Exhibit 14? 18 to answer the question. 19 MR. MARIANI: We'll stipulate these are the BY MR. LANDAU: 20 20 documents that my office produced pursuant to your 21 Q. Have you spoken to Mr. Galle about this 21 subpoena. 22 document? 22 MR. LANDAU: Okay. 23 A. On advice of counsel, I'm exercising my 23 BY MR. LANDAU: rights under the Fifth Amendment and decline to answer the O. And, Ms. Matthews, these are, in fact, text 24 24 25 question. 25 messages between yourself and Glenn Straub; is that Page 146 Page 148 Q. To your knowledge, was Mr. Straub involved 1 1 correct? in the friendly foreclosure of 115 Lower Church Hill in 2 2 MR. MARIANI: We'll stipulate to that, as 3 3 Connecticut? well. MR. SALAZAR: Objection to form. 4 4 MR. LANDAU: Okay. 5 THE WITNESS: On advice of counsel, I'm 5 BY MR. LANDAU: exercising my rights under the Fifth Amendment and 6 Q. Ms. Matthews, tell us about your 6 decline -- decline to answer the question. 7 7 relationship with Mr. Straub. 8 BY MR. LANDAU: 8 A. On advice ---9 9 MR. SALAZAR: Objection, relevancy. Q. In fact, isn't it true that Mr. Straub was 10 THE WITNESS: On advice of counsel, I'm 10 involved in the transaction referenced in this exhibit, exercising my rights under the Fifth Amendment and decline 11 Exhibit Number 13? 11 12 A. On advice of counsel, I'm exercising my 12 to answer the question. rights under the Fifth Amendment and decline to answer the 13 BY MR. LANDAU: 13 14 Q. Well, why is that -- why is there a 14 question. MR. SALAZAR: Objection, relevancy. 15 privilege concern with your conversations with Mr. Straub? 15 MR. LANDAU: We're up to 14. Call this A. On the advice of counsel, I'm exercising my 16 16 rights under the Fifth Amendment and decline to answer the 17 Composite 14. 17 (Thereupon, Composite Exhibit Number 14 was question. 18 18 marked for Identification.) 19 Q. Isn't it true that your concern is your 19 MR. MARIANI: Okay. For the record, can we 20 20 conversations and your dealings with Mr. Straub furthered identify Exhibit 14 by Bates stamp number, please? the EB-5 fraud? 21 21 MR. LANDAU: Well, it's Bates stamped twice 22 MR. SALAZAR: If that's a question, I object 22 23 23 it looks like, but in the way it was produced to us, the to the form. THE WITNESS: On advice of counsel, I'm 24 Bates stamps that were on it were the ones -- the larger 24 25 exercising my rights under the Fifth Amendment and decline ones at the top that begin at MM00001, and go all the way

Page 149 Page 151 to answer the question. THE WITNESS: On advice of counsel, I'm 1 2 BY MR. LANDAU: 2 exercising my rights under the Fifth Amendment and decline to answer the question. 3 Q. I'm going to walk you through, Ms. Matthews, 3 the highlighted sections of this document. 4 MR. LANDAU: John, I don't know what grounds 4 5 5 I would refer you to the text, and all of she can assert the Fifth on these questions. 6 the highlights are in yellow, March 15, 2018, you say, 6 MR. MARIANI: We're comfortable with the 7 I'll come work for you to pay off whatever. 7 assertion. Thank you. MR. SALAZAR: Objection to form. 8 8 BY MR. LANDAU: 9 BY MR. LANDAU: 9 Q. Flip to May 5, 2018, it looks like 7:43 a.m. Q. What are you referring to there? 10 My sister lent me money to hire someone in Connecticut, 10 MR. SALAZAR: Objection to form. but he got in a car accident. Also, apparently he has a 11 11 THE WITNESS: On advice of counsel, I'm conflict and won't be able to represent me. Hopefully I 12 12 13 exercising my rights under the Fifth Amendment and decline 13 can get the money back from him to hire someone else, not to answer the question. 14 sure who. 14 BY MR. LANDAU: 15 15 Are you asking Mr. Straub there to lend you 16 Q. What kind of work did you do for Mr. Straub? 16 money? A. On advice of counsel, I'm exercising my 17 17 A. On advice of counsel, I am exercising my rights under the Fifth Amendment and decline to answer the 18 rights under the Fifth Amendment and decline to answer the 18 auestion. 19 question. 19 20 Q. In fact, isn't it true that you never worked 20 Q. In fact, isn't it true that you're asking 21 for Mr. Straub? 21 him for money for defense counsel in the criminal action 22 A. On advice of counsel, I'm exercising my 22 in Connecticut? rights under the Fifth Amendment and decline to answer the 23 MR. SALAZAR: Objection, relevancy. 23 THE WITNESS: On advice of counsel, I'm question. 24 24 25 MR. SALAZAR: Objection on relevancy. 25 exercising my rights under the Fifth Amendment and decline Page 152 Page 150 BY MR. LANDAU: to answer the question. 1 1 2 Q. Further down, March 15, 2018, 7:51 p.m., 2 BY MR. LANDAU: 3 3 you're going to have dinner with Mr. Straub; isn't that Q. He did, in fact, lend you money to hire 4 counsel, did he not? 4 correct? 5 5 MR. SALAZAR: Objection, relevancy, form. On advice of counsel, I'm exercising my A. THE WITNESS: On advice of counsel, I'm 6 rights under the Fifth Amendment and decline to answer the 6 7 question. 7 exercising my rights under the Fifth Amendment and decline 8 Q. Flip to the next page, May 3, 2018, 8 to answer the question. 9 10:44 a.m. Again, you say, I'm ready to get to work when 9 BY MR. LANDAU: I get back. What does that mean? 10 10 Q. In fact, he filed a lawsuit against the A. On advice of counsel, I am exercising my attorney that you hired in -- in Connecticut; isn't that 11 11 12 rights under the Fifth Amendment and decline to answer the 12 correct? 13 question. 13 MR. SALAZAR: Objection to form. 14 THE WITNESS: On advice of counsel, I'm 14 MR. SALAZAR: Objection, relevancy. exercising my rights under the Fifth Amendment and decline 15 BY MR. LANDAU: 15 Q. What kind of work were you doing or seeking to answer the question. 16 16 17 to do for Mr. Straub? 17 BY MR. LANDAU: A. On advice of counsel, I'm exercising my 18 Q. May 5, 2018, 7:59 a.m., text from 18 rights under the Fifth Amendment and decline to answer the 19 Glenn Straub. Do you want to read that to us? 19 20 question. 20 MR. MARIANI: The document speaks for 21 Q. Ms. Matthews, I want to cut to the chase 21 itself. here. Isn't it accurate that you were having an affair 22 BY MR. LANDAU: 22 23 with Mr. Straub? 23 Q. Well, I'll go ahead and read it. 24 MR. SALAZAR: Objection to form and 24 Come on, any person that can raise kids can handle whatever hand that was dealt them. They won't be 25 relevancy.

Page 153 Page 155 a -- this won't be a walk in the park, but listen to two for you? 1 different lawyers sounds crazy, but you have government 2 MR. SALAZAR: Same objection. money, and people that want to make a name for themselves. 3 THE WITNESS: On advice of counsel, I'm and so far you're -- you're -- and so far you're 4 exercising my rights under the Fifth Amendment and decline convictable from what I can see. Just don't come back and 5 to answer the question. 6 listen to one-sided answers. You have to show the 6 BY MR. LANDAU: government that you have no push -- that you are no 7 Q. The monies that Mr. Straub lends to you, are 8 8 pushover, hard earned, smarter than nails. Prepare only they disclosed in your husband's bankruptcy D.I.P. time against a lifetime of a record and people talking 9 reports? 10 behind your back. One other thing, a publication person MR. SALAZAR: Same objection. 10 must be hired. Battles are won when the other side sees THE WITNESS: On advice of counsel, I'm 11 11 12 it's going to be hard. 12 exercising my rights under the Fifth Amendment and decline 13 What was your understanding of the advice 13 to answer the question. 14 Mr. Straub was giving you there? 14 BY MR. LANDAU: 15 15 A. On ---Q. In fact, the monies that are loaned to you 16 MR. SALAZAR: Objection, sorry, form and 16 or provided to you by Mr. Straub, they are not reflected 17 relevancy. 17 on your husband's debtor-in-possession reports in his 18 THE WITNESS: On advice of counsel, I'm 18 bankruptcy; isn't that correct? exercising my rights under the Fifth Amendment and decline 19 MR. SALAZAR: Same objection. 19 THE WITNESS: On advice of counsel, I'm to answer the question. 20 20 exercising my rights under the Fifth Amendment and decline 21 BY MR. LANDAU: 21 22 Q. In fact, he's actively participating in 22 to answer the question. giving you advice with regard to your criminal action in 23 BY MR. LANDAU: 23 Connecticut? 24 O. Refer your attention to Bates Number MM7, 24 25 MR. SALAZAR: Objection to form and 25 00007. May 9, 2018, 5:56 p.m., this is Mr. Straub Page 154 Page 156 relevancy. stating, I offered a car to Bob last night so he could 1 BY MR. LANDAU: drive something other than the four door. If you want the 2 Escalade or the new -- it says porch, but I think he means 3 Q. Correct? 3 4 Porsche, let me know. 4 A. On advice of counsel, I'm exercising my 5 rights under the Fifth Amendment and decline to answer the 5 And then you respond, hey, I don't need a 6 question. 6 car, mine is fine, but I need a job. When can I start 7 7 Q. And just so we're clear, you were indicted working for you? 8 in Connecticut; correct? 8 Again, what are you seeking to do for 9 9 A. On advice of counsel, I'm exercising my Mr. Straub there? rights under the Fifth Amendment and decline to answer the 10 10 MR. SALAZAR: Objection to form and 11 question. 11 relevancy. 12 Q. How are you paying for your attorneys in 12 THE WITNESS: On advice of counsel, I'm 13 13 exercising my rights under the Fifth Amendment and decline that action? 14 14 to answer the question. A. On advice of counsel, I'm exercising my BY MR. LANDAU: rights under the Fifth Amendment and decline to answer the 15 15 16 question. 16 Q. Page MM11, 00011, are you there? 17 Q. Mr. Straub continues to help pay for those 17 MR. MARIANI: That's in front of the 18 attorneys, does he not? 18 witness. 19 MR. SALAZAR: Objection, form, relevance --19 BY MR. LANDAU: 20 and relevancy. 20 O. Text on May 17, 2018, 11:51 a.m. from 21 THE WITNESS: On advice of counsel, I'm 21 Glenn Straub, beginning with sounds good. Do you see exercising my rights under the Fifth Amendment and decline 22 that? 22 23 to answer the question. 23 MR. SALAZAR: What page? Tell me what BY MR. LANDAU: 24 24 number. 25 25 Q. What else does Mr. Straub currently pay for MR. LANDAU: May 17th at 11:51 a.m.

	Page 157		Page 159
1	MR. SALAZAR: I'm sorry, which MM?	1	rights under the Fifth Amendment and decline to answer the
2	MR. LANDAU: 11.	2	question.
3	MR. SALAZAR: Oh, thank you.	3	MR. SALAZAR: Same objection.
4	MR. MARIANI: It's in front of the witness.	4	BY MR. LANDAU:
5	BY MR. LANDAU:	5	Q. Page MM17.
6	Q. Mr. Straub says, sounds good tonight or	6	MR. MARIANI: That page is before the
7	tomorrow. Like you to meet the lady that has money.	7	witness.
8	Trying to have her meet judge.	8	BY MR. LANDAU:
9	Who is the judge there that Mr. Straub was	9	Q. Third yellow text down, May 20, 2018,
10	referring to referring to, if you know?	10	8:46 p.m. Mr. Straub refers to you as a tease. Can you
11	MR. SALAZAR: Objection, relevance.	11	explain to us what's going on there?
12	THE WITNESS: On advice of counsel, I'm	12	MR. SALAZAR: Objection to form and
13	exercising my rights under the Fifth Amendment and decline		relevancy.
14	to answer the question.	14	THE WITNESS: On advice of counsel, I'm
15	BY MR. LANDAU:	15	exercising my rights under the Fifth Amendment and decline
16	Q. In fact, if you go to the yellow box at the	16	to answer the question.
17	bottom, text May 17, 2018, 4:26 p.m., the judge he's	17	BY MR. LANDAU:
18 19	referring to is Judge Colbath; isn't that correct? MR. SALAZAR: Same objection.	18 19	Q. Further down, later that night, 9:03 p.m.,
20	THE WITNESS: On advice of counsel, I'm	20	you're meeting him at somewhere, it appears, for dinner; is that correct?
21	exercising my rights under the Fifth Amendment and decline	21	MR. SALAZAR: Objection, relevancy.
22	to answer the question.	22	THE WITNESS: On advice of counsel, I'm
23	BY MR. LANDAU:	23	exercising my rights under the Fifth Amendment and decline
24	Q. Have you discussed any of your legal	24	to answer the question.
25	problems with Judge Colbath?	25	BY MR. LANDAU:
	Page 158		Page 160
1	Page 158 A. On advice of counsel, I'm exercising my	1	Page 160 Q. MM21.
1 2	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the	1 2	
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1	to answer the question.	1	exercising my rights under the Fifth Amendment and decline
2	BY MR. LANDAU:	2	to answer the question.
3	Q. The jewelry that he's referring to there,	3	BY MR. LANDAU:
4	where is it, Ms. Matthews?	4	Q. Further down, May 27, 2018, 2:48 p.m. This
5	MR. SALAZAR: Objection to form and	5	is a text from Mr. Straub, Bob have been calling all day
6	relevancy.	6	and you know how I feel. Call, please, if you have answer
7	THE WITNESS: On advice of counsel, I'm	7	or any other ideas. Call, I would like to move on to
8	exercising my rights under the Fifth Amendment and decline		other future items, please, or tell me my future.
9	to answer the question.	9	What is his future, Ms. Matthews?
10	BY MR. LANDAU:	10	MR. SALAZAR: Objection, relevancy.
11	Q. MM24. May 26, 2018, 6:39 p.m., Mr. Straub	11	THE WITNESS: On advice of counsel, I'm
12	says to you, sorry to hear that the holiday weekend isn't	12	exercising my rights under the Fifth Amendment and decline
13	going well unfortunately, you. You need to let me spice	13 14	to answer the question. BY MR. LANDAU:
14 15	it up. Promise, no sex jokes, not going to Twin Peaks or here to watch game tonight. Would rather spend some time	15	
16	with you, but I will take what I can get up to a point.	16	Q. Next page, MM26, May 27, 2018, 8:07 p.m., text from Mr. Straub, little bit better. Give me a
17	Breakfast, then tennis early for you, if you're up to some	17	month and I will make you feel a lot better, get some
18	lessons. Shame about tonight, I was looking forward to	18	sleep, help your daughter, satisfy your life partner,
19	tonight. Change your mind, call.	19	finally put some money away for a rainy day.
20	Ms. Matthews, what's going on there?	20	What is he offering you there, Ms. Matthews?
21	MR. SALAZAR: Objection, relevancy.	21	MR. SALAZAR: Objection to form and
22	THE WITNESS: On advice of counsel, I'm	22	relevancy.
23	exercising my rights under the Fifth Amendment and decline	23	THE WITNESS: On advice of counsel, I'm
24	to answer the question.	24	exercising my rights under the Fifth Amendment and decline
25	BY MR. LANDAU:	25	to answer the question.
	Page 162		Page 164
1	Q. I mean, you're clearly in a relationship	1	BY MR. LANDAU:
2	with him; isn't that correct?	2	Q. Page MM28, May 29, 2018, 5:30 p.m. This is
3 4	MR. SALAZAR: Objection, relevancy. BY MR. LANDAU:	3	a text from you to Mr. Straub. You say, e-mail you cruise
5	Q. At that point in time?	5	itinerary. Did you go on a cruise with Mr. Straub?
6	MR. SALAZAR: Objection, relevancy.	6	MR. SALAZAR: Objection to form and
7	THE WITNESS: On advice of counsel, I'm	7	relevancy.
8	exercising my rights under the Fifth Amendment and decline		THE WITNESS: On advice of counsel, I'm
9	to answer the question.	9	exercising my rights under the Fifth Amendment and decline
10	BY MR. LANDAU:	10	to answer that question.
11	Q. Next page, MM25. 5/26/18, 11:39 p.m. Game	11	BY MR. LANDAU:
12	over, back on the boat. Need to get some sleep, early	12	Q. In fact, you did go on a cruise with
13	breakfast with you, if possible, 8:00 or 8:30 a.m.?	13	Mr. Straub, didn't you?
14	Tennis, Wellington; ten o'clock shower; 11:30 drive to	14	MR. SALAZAR: Same objection.
15	look at three entertainment second generation centers that	15	THE WITNESS: On advice of counsel, I'm
16	tied into two I don't even know, 200,000 or \$2 million	16	exercising my rights under the Fifth Amendment and decline
17	rope course that I would finance that I would finance	17	to answer the question.
18	for you guys for you and guys like judge. We all would	18 19	BY MR. LANDAU:
19	make millions. Let me know if you can't make it, and the		Q. Page MM31. May 31, 2018, 8:30 a.m.,
20	judge and the one other will take off at around	20 21	Mr. Straub texted you, Bob can't have communication with me. Let's discuss that for a second.
171	12 o'clock	/ · I	me. Let 3 discuss that for a secolid.
21 22	12 o'clock. What is Mr. Straub financing for you there?		
22	What is Mr. Straub financing for you there?	22	What does that mean, Bob can't have
22 23	What is Mr. Straub financing for you there? MR. SALAZAR: Objection to form and		What does that mean, Bob can't have communication with me?
22	What is Mr. Straub financing for you there?	22 23	What does that mean, Bob can't have

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	Page 165		Page 167
1	exercising my rights under the Fifth Amendment and decline	1	exercising my rights under the Fifth Amendment and decline
2	to answer the question.	2	to answer the question.
3	BY MR. LANDAU:	3	BY MR. LANDAU:
4	Q. Isn't it correct that that has to do with	4 5	Q. Mister Mr. Straub paid for Mr. Galle to review that letter, isn't that correct?
5 6	the Judge's prohibition of Bob communicating with Glenn in the Connecticut criminal action?	6	A. On advice
7	MR. SALAZAR: Same objection.	7	MR. SALAZAR: Same objection. Pardon me.
8	THE WITNESS: On advice of counsel, I'm	8	THE WITNESS: of counsel, I'm exercising
9	exercising my rights under the Fifth Amendment and decline	9	my rights under the Fifth Amendment and decline to answer
10	to answer the question.	10	the question.
11	BY MR. LANDAU:	11	BY MR. LANDAU:
12	Q. Page MM32, towards the bottom, May 31, 2018,	12	Q. Next page, MM34, at the bottom, June 1,
13	10:20 a.m. B2W, which my kids tell me is by the way,	13	2018, 10:43 a.m., a text from you to Mr. Straub. You say
14	Bianca wants to go to Colombia, lol.	14	send Zink number, please; correct?
15	Are you asking Mr. Straub there to pay for	15	MR. SALAZAR: Objection, relevance.
16	your daughter to go to Colombia?	16	MR. MARIANI: The document is in front of
17	MR. SALAZAR: Objection, relevancy.	17	the witness.
18	THE WITNESS: On advice of counsel, I'm	18	THE WITNESS: On advice of counsel, I'm
19	exercising my rights under the Fifth Amendment and decline	19	exercising my rights under the Fifth Amendment and decline
20	to answer the question.	20	to answer the question.
21	BY MR. LANDAU:	21	BY MR. LANDAU:
22	Q. Next page, MM33, at the top, May 31, 2018,	22	Q. And when you say Zink, you refer to
23	1:07 p.m., text from you to Glenn. I'm not far from	23	Mr. Straub's attorney named, I believe is it Larry, yeah,
24	Wellington. Can I drop off lawyer engaging letter for	24	Larry Zink; isn't that correct?
25	Craig to look at?	25	MR. SALAZAR: Same objection.
	Page 166		Dogg 160
	Page 166		Page 168
1	Do you recall sending that text?	1	THE WITNESS: On advice of counsel, I'm
2	Do you recall sending that text? MR. SALAZAR: Objection, relevancy.	2	THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline
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	Page 169		Page 171
1	witness.	1	exercising my rights under the Fifth Amendment and decline
2	MR. LANDAU: John, I don't want to tell you	2	to answer the question.
3	wrong, because I just don't know.	3	BY MR. LANDAU:
4	MR. MARIANI: I'm asking for an estimate.	4	Q. And the next text is from Mr. Straub saying
5	MR. LANDAU: Yeah, I don't know, however	5	need number for your I'm assuming ATT means attorney,
6	long it takes. I apologize.	6	for conference call now, and then below that you provide a
7	MR. MARIANI: I want to remind you, you set	7	203 number, and then you say Brian Spears.
8	this for two hours, 11	8	Brian Spears is your criminal counsel;
9 10	MR. LANDAU: I did not set it for two hours. MR. MARIANI: Well, you said that one	9 10	correct? MR. SALAZAR: Same objection.
11	witness was going to start at 9:00, and one was going to	11	THE WITNESS: On advice of counsel, I'm
12	start	12	exercising my rights under the Fifth Amendment and decline
13	MR. LANDAU: I said Mr. Matthews immediately		to answer the question.
14	thereafter.	14	BY MR. LANDAU:
15	MR. MARIANI: The notice we got said	15	Q. And am I correct in what's happening here is
16	11:00 a.m. for Mr. Matthews, but I'd like you to give us	16	Mr. Straub is participating in a conference call with both
17	an estimate because now we have multiple people waiting.	17	yourself and Brian Spears, your criminal attorney; is that
18	I'm not trying to be	18	correct?
19	MR. LANDAU: Yeah, let me let me speak to	19	MR. SALAZAR: Same objection.
20	Mr. George.	20	THE WITNESS: On advice of counsel, I'm
21 22	MR. MARIANI: difficult, I'm trying to understand.	21 22	exercising my rights under the Fifth Amendment and decline to answer the question.
23	MR. LANDAU: No, I'm trying I apologize,	23	BY MR. LANDAU:
24	I'm not trying to be difficult at all.	24	Q. Next page, MM36 towards the bottom, June 1,
25	MR. MARIANI: Mia, let's leave, please.	25	2018 at 10:41 p.m., Glenn Straub, you okay, you hungry,
			1 / / / / / / / / / / / / / / / / / / /
	Page 170		Page 172
1	MR. LANDAU: You know, part of the problem	1	you want a drink, you hornet?
2	MR. LANDAU: You know, part of the problem is because of the assertion of the Fifth, it takes longer.	2	you want a drink, you hornet? What does he mean by hornet?
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Page 173 Page 175 texts you -- am I going too fast? I apologize. Are you minutes. And then Mr. Straub says, I'm asking too much. 1 2 there? 2 You are able to choose your partners that you would have 3 MR. MARIANI: Yes, we have the page. 3 companionship with, not being told that you should feel 4 4 guilty, not taking care of me like the others. We are BY MR. LANDAU: 5 Q. Mr. Straub states, yes, all good. You ask both adults and making out is something kid do. Sorry the 6 that what I do. Worker! Not a hypocrite. Rewritten and 6 relationship came out as a form of tease and not a couple 7 will be sent in 15 minutes. Don't know how to send to 7 with serious intention. I have only me to blame, not to 8 you, but Craig's office will send to the lawyer up north. 8 see this when you told me, show me first. Don't worry, If you can't get a copy because Bob's lawyer shouldn't be 9 the two daughters will have an open door with me if they talking to you, that you should -- and then the next text 10 want. Don't want to get in the middle of their parents 10 11 right after, not get into his lawyer, that's not 11 and them wanting their family to provide what I would have 12 protected. Call me and I can read because this letter 12 been helping out with. I look at the kids as they never 13 will be discoverable. 13 had anything out of this kind of habits. 14 What is Mr. Straub referring to there? 14 Ms. Matthews, what is Mr. Straub referring 15 MR. SALAZAR: Same objection. 15 to there? 16 THE WITNESS: On advice of counsel, I'm 16 MR. SALAZAR: Same objection. exercising my rights under the Fifth Amendment and decline 17 17 THE WITNESS: On advice of counsel, I'm to answer the question. 18 exercising my rights under the Fifth Amendment and decline 18 to answer the question. 19 BY MR. LANDAU: 19 BY MR. LANDAU: 20 20 Q. In fact, he's giving you legal advice there; 21 is that correct? 21 Q. Isn't it true that he's seeking to further 22 MR. SALAZAR: Same objection. 22 the affair with you in those texts? THE WITNESS: On advice of counsel, I'm MR. SALAZAR: Same objection. 23 23 exercising my rights under the Fifth Amendment and decline 24 THE WITNESS: On advice of counsel, I'm 24 25 to answer the question. 25 exercising my rights under the Fifth Amendment and decline Page 174 Page 176 BY MR. LANDAU: to answer the question. 1 1 2 Q. And then below, 6 -- June 5, 2018, 2 BY MR. LANDAU: 3 3 4:37 p.m., Mr. Straub says, no problem, just keeping you Q. Let me ask you, Ms. Matthews, at that time awake, if necessary, just to know if my investment is 4 does your husband know this is going on? 4 5 5 MR. SALAZAR: Same objection. okay. THE WITNESS: On advice of counsel, I'm 6 What is his investment --6 7 MR. SALAZAR: Same objection. 7 exercising my rights under the Fifth Amendment and decline 8 BY MR. LANDAU: 8 to answer the question. 9 BY MR. LANDAU: Q. -- Ms. Matthews? 9 10 MR. SALAZAR: Same objection. 10 Q. MM61, June 13, 2018, 11:41 a.m., a text from THE WITNESS: On advice of counsel, I'm you to Mr. Straub. What do you think about leaving a 11 11 12 exercising my rights under the Fifth Amendment and decline 12 little earlier and meeting me at Saks outlet? to answer the question. 13 Further down, Mr. Straub responds, okay. 13 14 14 BY MR. LANDAU: Just pick out what my little girl wants and use CC, or I Q. You're the investment; isn't that correct? 15 15 will be there on time. MR. SALAZAR: Same objection. 16 16 I assume, Ms. Matthews, CC he means credit 17 THE WITNESS: On advice of counsel, I'm 17 card? exercising my rights under the Fifth Amendment and decline 18 MR. SALAZAR: Objection, relevancy. 18 to answer the question. 19 THE WITNESS: On advice of counsel, I am 19 20 BY MR. LANDAU: 20 exercising my rights under the Fifth Amendment and decline to answer the question. 21 Q. MM57, June 11, 2018, 9:44 p.m., Mr. Straub 21 22 texts you, need to talk sometime tonight, if possible. 22 BY MR. LANDAU: 23 You respond, no problem, cooking Bianca 23 Q. MM62, June 14, 2018, 9:45 a.m., a text from you to Mr. Straub. Can I use your card to take girls 24 dinner. I'll be free soon. 24 25 Mr. Straub responds, private, please, ten shopping today? I was a very, very bad -- it was a very,

	Page 177		Page 179
1	very bad night for them, too.	1	BY MR. LANDAU:
2	MR. SALAZAR: Objection, relevancy.	2	Q. I'll take that as a yes.
3	MR. LANDAU: I didn't even ask a question.	3	MR. SALAZAR: I guess objection to form.
4	MR. SALAZAR: Oh, sorry. I thought you were	4	BY MR. LANDAU:
5	done.	5	Q. Ms. Matthews, do you have a wallet with you
6	BY MR. LANDAU:	6	here today?
7	Q. My question, Ms. Matthews, is, again, that's	7	MR. SALAZAR: Objection, relevancy.
8	an example of you using Mr. Straub's credit card to	8	THE WITNESS: On advice of counsel, I'm
9	purchase goods for you and your family; is that not	9	exercising my rights under the Fifth Amendment and decline
10	correct?	10	to answer the question.
11	MR. SALAZAR: Same objection.	11	BY MR. LANDAU:
12	THE WITNESS: On advice of counsel, I'm	12	Q. I'd like to see your wallet. Can you
13	exercising my rights under the Fifth Amendment and decline	13	produce your wallet?
14	to answer the question.	14	MR. MARIANI: We're not going to produce her
15	BY MR. LANDAU:	15	wallet.
16	Q. And then if you flip to the next page, MM63,	16	MR. LANDAU: Why not?
17	you're texting Mr. Straub a picture of a credit card; is	17	MR. MARIANI: Because it's a personal item
18	that correct?	18	and you didn't ask for it with the subpoena. You have no
19	MR. SALAZAR: Same objection.	19	right to see her wallet, so move on.
20	THE WITNESS: On advice of counsel, I'm	20	BY MR. LANDAU:
21	exercising my rights under the Fifth Amendment to decline	21	Q. Do you have in your wallet any credit cards
22	to answer the question.	22	belonging to Mr. Straub?
23	BY MR. LANDAU:	23	MR. SALAZAR: Same objection.
24	Q. And that's the credit card that Mr. Straub	24	THE WITNESS: On advice of counsel, I'm
25	let you use, or as the complaint states, use unauthorized;	25	exercising my rights under the Fifth Amendment and decline
١.	Page 178		Page 180
1	is that correct?	1	to answer the question.
2	is that correct? MR. SALAZAR: Same objection.	2	to answer the question. BY MR. LANDAU:
2 3	is that correct? MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm	2 3	to answer the question. BY MR. LANDAU: Q. These texts end on October 25, 2018. Do you
2 3 4	is that correct? MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline	2 3 4	to answer the question. BY MR. LANDAU: Q. These texts end on October 25, 2018. Do you have on your cell phone any texts after that date from
2 3 4 5	is that correct? MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.	2 3 4 5	to answer the question. BY MR. LANDAU: Q. These texts end on October 25, 2018. Do you have on your cell phone any texts after that date from Mr. Straub?
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	Page 181		Page 183
1		1	·
2	Q. Next page, MM66, June 14, 2018, 7:22 p.m. Mr. Straub says to sends a text to you, back sleeping	1 2	exercising my rights under the Fifth Amendment and decline to answer the question.
3	with himeasy.	3	BY MR. LANDAU:
4	Is Mr. Straub referring to that you're back	4	Q. He then further says, 10:27 p.m.,
5	sleeping with Mister your husband, Mr. Matthews?	5	Mr. Straub's text to you, is that a threat just like my
6	MR. SALAZAR: Same objection.	6	over \$400,000 gamble?
7	THE WITNESS: On advice of counsel, I'm	7	MR. SALAZAR: Same objection.
8	exercising my rights under the Fifth Amendment and decline	8	BY MR. LANDAU:
9	to answer the question.	9	Q. Ms. Matthews, what is he referring to there?
10	BY MR. LANDAU:	10	MR. SALAZAR: Same objection.
11	Q. He's jealous there, isn't he? Mr. Straub,	11	THE WITNESS: On advice of counsel, I'm
12	he's jealous; correct?	12	exercising my rights under the Fifth Amendment and decline
13	MR. SALAZAR: Same objection.	13	to answer the question.
14	THE WITNESS: On advice of counsel, I'm	14	BY MR. LANDAU:
15	exercising my rights under the Fifth Amendment and decline		Q. Mr. Straub's \$400,000 gamble has to do with
16	to answer the question.	16	the EB-5 investments; doesn't it?
17	BY MR. LANDAU:	17	MR. SALAZAR: Same objection.
18	Q. Your response, June 14, 2018, 7:24 p.m.,	18	THE WITNESS: On advice of counsel, I'm
19	nope, and then you further say, wedge is bigger than ever;	19	exercising my rights under the Fifth Amendment and decline
20	is that correct?	20	to answer the question.
21	MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm	21 22	BY MR. LANDAU:
22 23	,		Q. I'll take that as a yes.
24	exercising my rights under the Fifth Amendment and decline to answer the question.	24	MR. SALAZAR: Objection to form. BY MR. LANDAU:
25	BY MR. LANDAU:	25	Q. MM69, June 14, 2018, 10:47 p.m.,
	BT MR. EMMONO.	23	Q. 1414107, June 14, 2010, 10.47 p.m.,
	Page 182		Page 184
1		1	
1 2	Q. Page MM68, June 14, 2018, 9:44 p.m., a text from you to Mr. Straub. If our relationship is this	1 2	Page 184 Glenn Straub text to you, I waited this long to be with you and help hurting people like your husband put you into
	Q. Page MM68, June 14, 2018, 9:44 p.m., a text		Glenn Straub text to you, I waited this long to be with
2	Q. Page MM68, June 14, 2018, 9:44 p.m., a text from you to Mr. Straub. If our relationship is this	2	Glenn Straub text to you, I waited this long to be with you and help hurting people like your husband put you into
2 3	Q. Page MM68, June 14, 2018, 9:44 p.m., a text from you to Mr. Straub. If our relationship is this fragile, we have a serious problem. 9:56 p.m., he responds, you deserve a better life but you surround yourself with some that lies to you,	2 3	Glenn Straub text to you, I waited this long to be with you and help hurting people like your husband put you into a fucking mess, and you listen to those continue lies and think you are hearing me give you advice. A salesman can sell people anything. I thought you were coming around.
2 3 4	Q. Page MM68, June 14, 2018, 9:44 p.m., a text from you to Mr. Straub. If our relationship is this fragile, we have a serious problem. 9:56 p.m., he responds, you deserve a better life but you surround yourself with some that lies to you, and I can't seem to get you to understand.	2 3 4	Glenn Straub text to you, I waited this long to be with you and help hurting people like your husband put you into a fucking mess, and you listen to those continue lies and think you are hearing me give you advice. A salesman can sell people anything. I thought you were coming around. I hope my kids will remember what dad told them, how to
2 3 4 5 6 7	Q. Page MM68, June 14, 2018, 9:44 p.m., a text from you to Mr. Straub. If our relationship is this fragile, we have a serious problem. 9:56 p.m., he responds, you deserve a better life but you surround yourself with some that lies to you,	2 3 4 5	Glenn Straub text to you, I waited this long to be with you and help hurting people like your husband put you into a fucking mess, and you listen to those continue lies and think you are hearing me give you advice. A salesman can sell people anything. I thought you were coming around. I hope my kids will remember what dad told them, how to look through corners, I'm assuming it says.
2 3 4 5 6 7 8	Q. Page MM68, June 14, 2018, 9:44 p.m., a text from you to Mr. Straub. If our relationship is this fragile, we have a serious problem. 9:56 p.m., he responds, you deserve a better life but you surround yourself with some that lies to you, and I can't seem to get you to understand. You respond, 9:57 p.m., I made a huge step last night.	2 3 4 5 6 7 8	Glenn Straub text to you, I waited this long to be with you and help hurting people like your husband put you into a fucking mess, and you listen to those continue lies and think you are hearing me give you advice. A salesman can sell people anything. I thought you were coming around. I hope my kids will remember what dad told them, how to look through corners, I'm assuming it says. What is Mr. Straub referring to there,
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Page MM68, June 14, 2018, 9:44 p.m., a text from you to Mr. Straub. If our relationship is this fragile, we have a serious problem. 9:56 p.m., he responds, you deserve a better life but you surround yourself with some that lies to you, and I can't seem to get you to understand. You respond, 9:57 p.m., I made a huge step last night. Are you referring there, Ms. Matthews, to telling Mr. Matthews that you will be leaving him? MR. SALAZAR: Objection on relevancy. THE WITNESS: On advice of counsel, I am exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. And then further down the page, later that night, Mr. Straub says to you, 10 10:07 p.m., one drink at Imoto? MR. SALAZAR: Objection, relevancy. BY MR. LANDAU: Q. And then he further says it looks like he's trying to say Improv. Did you have a drink later	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Glenn Straub text to you, I waited this long to be with you and help hurting people like your husband put you into a fucking mess, and you listen to those continue lies and think you are hearing me give you advice. A salesman can sell people anything. I thought you were coming around. I hope my kids will remember what dad told them, how to look through corners, I'm assuming it says. What is Mr. Straub referring to there, Ms. Matthews? MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU: Q. You respond, I'm shocked and disappointed by all this, and then you further say, call me; is that correct? MR. SALAZAR: Same objection. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU:

Page 185 Page 187 dollars per hour, a couple hours a day, so it won't be on something new, get up and work. 1 2 2 What was your response to that, cheap? 3 Why are you asking Mr. Straub to pay for 3 Ms. Matthews? training for your daughter? 4 MR. SALAZAR: Same objection. 4 5 MR. SALAZAR: Are you done? Sorry, is that 5 THE WITNESS: On advice of counsel, I'm 6 6 exercising my rights under the Fifth Amendment and decline the question? 7 Objection, relevancy. 7 to answer the question. 8 THE WITNESS: On advice of counsel, I'm 8 BY MR. LANDAU: 9 9 exercising my rights under the Fifth Amendment and decline Q. MM80, June 20, 2018, 2:42 p.m., text from to answer the question. 10 10 Glenn Straub to you. BY MR. LANDAU: 11 11 If you're not going to go to New York and 12 Q. MM75, June 18, 2018, 10:44 a.m., a text from 12 not call me back about tickets for you and my flight and 13 you to Mr. Straub. I think I may give her the little 13 hotel for a couple of days of shopping and shows like we hoops you bought me. Is that okay with you? 14 were going to do, then please call for three minutes so I 14 And you're referring to -- is that referring 15 know how to proceed, and that you're not just busy helping 15 to earrings that you want to give to your daughter that 16 your daughter and not changed your mind. 16 17 were given to you by Mr. Straub? 17 Ms. Matthews, did you, in fact, go with 18 MR. SALAZAR: Objection, no relevancy 18 Mr. Straub to New York? MR. SALAZAR: Objection, relevancy. between this and bidding on a hotel in Palm Beach. 19 19 20 THE WITNESS: On advice of counsel, I'm 20 BY MR. LANDAU: exercising my rights under the Fifth Amendment and decline 21 Q. You can answer. 21 22 A. On advice of counsel, I'm exercising my 22 to answer the question. rights under the Fifth Amendment and decline to answer the BY MR. LANDAU: 23 23 24 Q. Next page, MM81. June 21, 2018, 8:34 a.m., 24 question. 25 Q. Mr. Straub responds on June 18, 2018, okay, 25 text from Mr. Straub to you. Based on our -- based on Page 188 Page 186 and then he says, as you know, the prices of gold doubled, your conversation, if you don't change your mind that you 1 so I get one BJ for each side over three days. 2 are leaving Bob and looking around for a while before 2 3 3 MR. SALAZAR: Are you done? Is there a settling down, if ever again. I can't believe your 4 4 question there? attorney hasn't highly recommended that choice already 5 I want to express my embarrassment on your 5 because as these prosecution continue, each individual behalf, Phil, and I object on the grounds of relevancy and 6 6 will have their own story, and the federal boys in EB-5, 7 to form. 7 whoever they are at that time, and other, in legal terms, 8 MR. LANDAU: And I'm embarrassed that we 8 interested parties like me, will treat you defender each 9 9 have to be here reading through this. different. Bob will have a different story to tell to 10 10 MR. SALAZAR: You should -- you should be, reduce his time and you will have your -- because it would you're driving the train. be suicide for you to get dragged into his mess. 11 11 12 BY MR. LANDAU: 12 Ms. Matthews, what is Mr. Straub referring 13 Q. Ms. Matthews, again, it seems pretty clear 13 to there? that you have a deep relationship, and close and personal 14 MR. SALAZAR: Objection, irrelevant. 14 insider relationship with Mr. Straub, is that -- isn't 15 THE WITNESS: On advice of counsel, I'm 15 exercising my rights under the Fifth Amendment and decline 16 that correct? 16 17 MR. SALAZAR: Objection, relevancy, form. 17 to answer the question. THE WITNESS: On advice of counsel, I'm 18 BY MR. LANDAU: 18 exercising my rights under the Fifth Amendment and decline 19 Q. In fact, he's trying to scare you, isn't he? 19 20 to answer the question. 20 MR. SALAZAR: Same objection. 21 21 BY MR. LANDAU: THE WITNESS: On advice of counsel, I'm 22 Q. Further down the page, June 19, 2018, 22 exercising my rights under the Fifth Amendment and decline 23 8:32 a.m., Mr. Straub's text to you, congratulations on 23 to answer the question. 24 another job. I think I'm going to marry you and live off 24 BY MR. LANDAU: you, you know, like a kept woman. I'm going -- I'm good 25 Q. MM86, June 23, 2018, 11:42 a.m., you text

Page 189 Page 191 Mr. Straub, Hamilton, Come Far Away, Harry Potter, and rights under the Fifth Amendment and decline to answer the 1 then you say in parens, not a musical, Dear Evan Hansen, 2 auestion. 3 3 Once on This Island. BY MR. LANDAU: 4 Ms. Matthews, those are all names of 4 Q. And then June 23, 2018, 6:44 p.m., we're now 5 5 Broadway shows, are they not? on MM88, a text from you to Mr. Straub. I'm ready when 6 MR. SALAZAR: Objection, relevancy, although 6 you are to leave. 7 I do recommend Hamilton and Evan, excellent. 7 And then at 7:05 p.m., Mr. Straub responds, 8 8 BY MR. LANDAU: 45th between 8th and 9th. Theater again? In taxi. 9 9 Ms. Matthews, you're clearly in New York Q. Ms. Matthews -- Ms. Matthews, I don't believe you answered. 10 10 there; correct? MR. SALAZAR: Objection, relevancy. 11 A. On advice of counsel, I'm exercising my 11 rights under the Fifth Amendment and decline to answer the 12 THE WITNESS: On advice of counsel, I'm 12 13 exercising my rights under the Fifth Amendment and decline 13 question. 14 MR. SALAZAR: Objection, relevancy. 14 to answer the question. 15 BY MR. LANDAU: 15 BY MR. LANDAU: Q. Ms. Matthews, I notice that you're crying. 16 Q. And then you respond 7th and 8th, 16 John Golden Theatre. Where is the John Golden Theatre, 17 Why are you crying? 17 18 MR. SALAZAR: Wow, Phil, objection, 18 Ms. Matthews? 19 19 irrelevant. A. On advice of counsel, I'm exercising my 20 rights under the Fifth Amendment and decline to answer the 20 MR. STRAUB: She's an actress. 21 (Mr. Mariani and Ms. Matthews confer.) 21 auestion. 22 MR. LANDAU: Mr. Mariani, there's a question 22 MR. SALAZAR: Object on the grounds of 23 relevancy. The theatre has nothing to do with this credit 23 pending. 24 bid motion. 24 MR. MARIANI: I understand. 25 THE WITNESS: My eyes are watering from 25 BY MR. LANDAU: Page 190 Page 192 yawning and from not getting a lot of -- from working 1 Q. MM92, June 25, 2018, 9:16 p.m., Glenn Straub 1 2 2 texts you saying, I guess the reason I'm real busy is hard. 3 BY MR. LANDAU: 3 because we checked and double checked the draft of the Q. Okay. What kind of work? What do you do, 4 suit that you will get before it gets filed. If you text 4 5 what kind of work? 5 me an e-mail or hotel number, I can send it tomorrow so 6 MR. SALAZAR: Objection, relevancy. 6 you have an idea that we would be flying under. It will 7 THE WITNESS: On advice of counsel, I'm 7 be marked draft and is being changed up to bring filed 8 exercising my rights under the Fifth Amendment and decline 8 with the secretary or state and up north. Read, and if to answer the question. 9 you have questions or want to talk before it is put out to 10 the public, call. After you read, you will see why I 10 BY MR. LANDAU: couldn't call as much. We have to -- we have to have Q. So as we go further through this, in the 11 11 12 next few days, you then, in fact, go to New York with 12 evidence for each point to prove the claims. Good luck. 13 Mr. Straub, don't you? 13 What is happening there, Ms. Matthews? 14 MR. SALAZAR: Same objection, irrelevance. 14 A. On the advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the THE WITNESS: On advice of counsel, I'm 15 15 exercising my rights under the Fifth Amendment and decline 16 question. 16 17 MR. SALAZAR: Object to relevancy, same 17 to answer the question. 18 18 BY MR. LANDAU: objection. 19 BY MR. LANDAU: 19 Q. In fact, Mr. Straub there is threatening you 20 Q. MM87, June 23, 2018, it appears that you're 20 with filing the lawsuit that was ultimately filed in St. Lucie County; isn't that correct? 21 texting what looks like a picture of a ticket, a show 21 22 ticket or a ticket to an event; is that correct? 22 MR. SALAZAR: Same objection. 23 23 A. On advice of --THE WITNESS: On advice of counsel, I'm MR. SALAZAR: Objection, irrelevant. exercising my rights under the Fifth Amendment and decline 24 24 THE WITNESS: -- counsel, I am exercising my 25 25 to answer the question.

Page 193 Page 195 BY MR. LANDAU: Attorney or District Attorney discussed any of this with 1 1 2 Q. MM95, July 3, 2018, 1:19 p.m., Mr. Straub's 2 you? 3 text to you, found a county that will keep these facts out MR. SALAZAR: Same objection. 4 of the public eyes and your daughter friends' gossip. 4 THE WITNESS: On advice of counsel, I'm Planning a lot of things that I have to get done in the 5 exercising my rights under the Fifth Amendment and decline next six days, so unless I can work out something with 6 to answer the question. 6 7 these items verbally, the different claims will be shown. 7 BY MR. LANDAU: 8 8 Just remember, when you called for help, I was the only Q. Are you aware that Mr. Straub is being one that came through and now you can't remember. Shame 9 investigated by the Broward County attorney for 10 allegations similar to what's going on here? 10 on you. 11 Ms. Matthews, my question is: Isn't it true 11 MR. SALAZAR: Object on the grounds of Mr. Straub is referring to the complaint that -- that he 12 12 relevance to the credit bid motion that's pending, there's 13 was about to file in St. Lucie County? 13 none whatsoever. 14 A. On advice of counsel, I'm exercising my 14 BY MR. LANDAU: rights under the Fifth Amendment and decline to answer the 15 15 Q. You can answer. question. 16 A. On advice of counsel, I'm exercising my 16 17 MR. SALAZAR: Same objection on the grounds 17 rights under the Fifth Amendment and decline to answer the 18 18 question. of relevancy. 19 19 BY MR. LANDAU: Q. MM98, July 16, 2018, 1:10 p.m., text from Q. Where he says found a county, that was -- he 20 you to Mr. Straub. Well, the weekend is over. So as bad 20 21 was referring to St. Lucie County; correct? 21 my situation is, I can't accept your offer to be a 22 MR. SALAZAR: Same objection. 22 significant other in order for you to drop the lawsuit. THE WITNESS: On advice of counsel, I'm 23 This whole thing is heart breaking. I can't say that we 23 exercising my rights under the Fifth Amendment and decline 24 would end up together, but I will say any hopes of that 24 25 to answer the question. are dashed with your recent actions and behavior. Being Page 196 Page 194 BY MR. LANDAU: with someone who threatens to put me in jail, promises 1 1 2 Q. Explain to me why on the one hand he's 2 things, then takes them away, and tells me that he will do 3 threatening to sue you, but then on the other hand trying 3 whatever he can to destroy me, won't work. I wish things 4 were different. 4 to protect your privacy? 5 MR. SALAZAR: Objection, relevancy. 5 So in sending that text, you're expressing THE WITNESS: On advice of counsel, I'm 6 6 to Mr. Straub you're not going to -- you're -- you're 7 exercising my rights under the Fifth Amendment and decline 7 ending your relationship with him; is that accurate? 8 to answer the question. 8 MR. SALAZAR: Objection to relevancy. 9 BY MR. LANDAU: 9 THE WITNESS: On advice of counsel, I'm 10 10 Q. Isn't it because you and Mr. Straub have a exercising my rights under the Fifth Amendment and decline very complicated relationship? to answer the question. 11 11 12 MR. SALAZAR: Objection, relevancy. 12 BY MR. LANDAU: 13 THE WITNESS: On advice of counsel, I'm 13 Q. MM99, July 17, 2018, 12:21 p.m., text from exercising my rights under the Fifth Amendment and decline 14 Mr. Straub to you, just finished Bob's local lawyer and 14 to answer the question. will have hours next week with his federal criminal 15 15 BY MR. LANDAU: lawyer. You are playing with fire, not helping, instead 16 16 17 Q. And so that was on July 3, 2018, and the 17 just turning your head. Listen, you're out of your 18 complaint that we've already marked as Exhibit 10, was 18 acting/mother/smart person league. Get on board or you filed on July 5, 2018; isn't that correct? 19 will lose everything. I'm getting tired of this type of 19 20 MR. SALAZAR: Objection on relevancy. 20 unappreciated work. THE WITNESS: On advice of counsel, I'm 21 21 And then he follows up with a text later on exercising my rights under the Fifth Amendment and decline 22 that afternoon, 2:05 p.m., I see one more piece of the 22 23 to answer the question. 23 puzzle, you don't understand my way, and then he writes

Mia Matthews at me.com, provide your Social Security

number and date of birth, and he goes, you're just a kid.

24 25

24

25

BY MR. LANDAU:

Q. Ms. Matthews, has the Broward County Public

Page 197 Page 199 Why is -- what is he trying to express in Things not going to get better. You are going to live 1 2 those texts? 2 this way for some time. MR. SALAZAR: Objection, relevancy. 3 3 Ms. Matthews, my question to you is: What 4 THE WITNESS: On advice of counsel, I'm 4 is Mr. Straub referring to there when he says \$600 room 5 exercising my rights under the Fifth Amendment and decline 5 and \$500 cash? to answer the question. 6 MR. SALAZAR: Same objection. 6 7 BY MR. LANDAU: 7 THE WITNESS: On advice of counsel, I'm 8 8 Q. In fact, you respond, July 18, 2018, exercising my rights under the Fifth Amendment and decline 9:16 a.m. saying, I've tried to reason with you, but 9 9 to answer the question. threats and intimidation don't -- do not work to get me to 10 10 BY MR. LANDAU: be with you, they only work to terrify me. Please don't Q. Did you further your affair with him, is 11 11 12 communicate with me anymore. 12 that what he's referring to? A. On advice of counsel, I'm exercising my 13 Did Mr. Straub continue to communicate with 13 14 you after that text? 14 rights under the Fifth Amendment and decline to answer the 15 MR. SALAZAR: Objection, relevancy. 15 question. THE WITNESS: On advice of counsel, I'm MR. SALAZAR: Sorry, I have an objection to 16 16 17 exercising my rights under the Fifth Amendment and decline 17 the form of that question and to its relevancy. to answer the question. 18 MR. LANDAU: Guys, I apologize, I only have 18 one copy of this, but it's a check I just want to ask 19 BY MR. LANDAU: 19 20 Q. In fact, he did continue to communicate with 20 Ms. Matthews about. 21 you, didn't he? 21 MR. GEORGE: It's going to be 15. 22 A. On advice of counsel, I'm exercising my 22 MR. SALAZAR: It must have something to do 23 with the credit bid motion filed eight years later. 23 rights under the Fifth Amendment and decline to answer the 24 (Thereupon, Exhibit Number 15 was marked for 24 question. 25 MR. SALAZAR: Sorry, same objection, 25 Identification.) Page 198 Page 200 BY MR. LANDAU: 1 relevancy. 1 BY MR. LANDAU: 2 2 Q. Ms. Matthews ---3 Q. MM103. August 8, 2018, 1:23 p.m., a text 3 MR. SALAZAR: Sorry, can I take a quick from you to Mr. Straub. I talked to him. Told him the 4 4 look? 5 truth. He was relieved we didn't have sexual contact. 5 MR. LANDAU: Sure. And understood my desperation in trying to get you to back BY MR. LANDAU: 6 6 7 off the lawsuit. He won't be showing up anywhere. No 7 Q. I'm showing you what's been marked as 8 worries. 8 Exhibit 15, a check from 160 Royal Palm, LLC, and it's 9 9 paid to Chapman & Galle trust account for \$60,000, and in When you say I talked to him, are you 10 referring to your husband, Robert Matthews? the memo line it says escrow for house. 10 MR. SALAZAR: Same objection. Have you seen this document before? 11 11 12 THE WITNESS: On the advice of counsel, I'm 12 A. On advice of counsel, I'm exercising my exercising my rights under the Fifth Amendment and decline 13 rights under the Fifth Amendment and decline to answer the 13 to answer the question. 14 question. 14 BY MR. LANDAU: 15 MR. SALAZAR: Sorry, objection on relevancy. 15 16 Q. Later that day, 1:52 p.m., a text from 16 BY MR. LANDAU: 17 Mr. Straub to you. Today started seven hours ago and the 17 Q. The notation escrow for house, does this phone shows seven calls tried to this phone, don't worry. 18 refer to money being paid related to your house? I don't leave my guard down ever. You're just putting a 19 A. On advice of counsel, I'm exercising my 19 20 bandage on a gaping hole. Last night was no different 20 rights under the Fifth Amendment and decline to answer the 21 than any -- than any other evening with me. I'm looking 21 question. for more out of a relationship. \$600 room and \$500 cash 22 MR. SALAZAR: I'm sorry. Same objection, 23 23 isn't going to do it, but continue teasing me, will show relevancy. you how the real world works. Good luck on your alliance. MR. GEORGE: What's the date of the check? 24 24 Hard work usually wins. Too bad you're brainwashed. 25 MR. SALAZAR: September 2010.

	Page 201		Page 203
1	MR. MARIANI: September 2, 2010.	1	Robert Matthews, do you discuss your personal finances
2	MR. GEORGE: Thank you.	2	with each other?
3	BY MR. LANDAU:	3	A. On advice of counsel, I'm exercising my
4	Q. In fact, Ms. Matthews, isn't it true that	4	rights under the Fifth Amendment and decline to answer the
5	this money this does represent \$60,000 that went to one	5	question.
6	of your homes?	6	MR. SALAZAR: Objection, relevancy.
7	MR. SALAZAR: Same objection, irrelevant.	7	BY MR. LANDAU:
8	THE WITNESS: On advice of counsel, I'm	8	Q. So I assume that the two of you do discuss
9	exercising my rights under the Fifth Amendment and decline	9	your personal finances together; isn't that correct?
10	to answer the question.	10	MR. SALAZAR: Same objection.
11	MR. LANDAU: Mark this as 16. I only have	11	THE WITNESS: On advice of counsel, I'm
12	one.	12	exercising my rights under the Fifth Amendment and decline
13	(Thereupon, Exhibit Number 16 was marked for	13	to answer the question.
14	Identification.)	14	BY MR. LANDAU:
15	BY MR. LANDAU:	15	Q. Let's go through the disbursements.
16	Q. Ms. Matthews, the document that we have	16	Mr. Matthews lists here \$766.39 for household expenses,
17	marked as Exhibit 16, this is a debtor-in-possession	17	food and clothing.
18	monthly operating report that was filed in your husband's	18	Can you tell us what was purchased with that
19	bankruptcy case on November 20, 2018.	19	money?
20	Is that the document you have in front of	20	MR. SALAZAR: Same objection.
21	you?	21	THE WITNESS: On advice of counsel, I'm
22	MR. MARIANI: That's before the witness.	22	exercising my rights under the Fifth Amendment and decline
23	BY MR. LANDAU:	23	to answer the question.
24	Q. Okay. Ms. Matthews, have you ever seen this document before?	24	BY MR. LANDAU:
25	document before:	25	Q. You live in a large home in Palm Beach;
	Page 202		Page 204
1		1	Page 204 correct?
1 2	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the		
	A. On advice of counsel, I'm exercising my		correct?
2	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the	2	correct? A. On advice of counsel, I'm exercising my
2 3	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.	2 3	correct? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the
2 3 4	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And I would ask you to turn to the first page or actually it's Page 2 of 8. Actually, let's flip to the next page, 3 of 8, and this document shows	2 3 4	correct? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.
2 3 4 5 6 7	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And I would ask you to turn to the first page or actually it's Page 2 of 8. Actually, let's flip to the next page, 3 of 8, and this document shows beginning cash of \$12,394.56. Do you see that?	2 3 4 5 6 7	correct? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And, Ms. Matthews, the costs to maintain a home of that stature are quite expensive; isn't that correct?
2 3 4 5 6 7 8	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And I would ask you to turn to the first page or actually it's Page 2 of 8. Actually, let's flip to the next page, 3 of 8, and this document shows beginning cash of \$12,394.56. Do you see that? MR. MARIANI: It's before the witness.	2 3 4 5 6 7 8	correct? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And, Ms. Matthews, the costs to maintain a home of that stature are quite expensive; isn't that correct? MR. SALAZAR: Same objection, relevancy.
2 3 4 5 6 7 8 9	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And I would ask you to turn to the first page or actually it's Page 2 of 8. Actually, let's flip to the next page, 3 of 8, and this document shows beginning cash of \$12,394.56. Do you see that? MR. MARIANI: It's before the witness. BY MR. LANDAU:	2 3 4 5 6 7 8 9	correct? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And, Ms. Matthews, the costs to maintain a home of that stature are quite expensive; isn't that correct? MR. SALAZAR: Same objection, relevancy. THE WITNESS: On advice of counsel, I'm
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2 3 4 5 6 7 8 9 10 11 12	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And I would ask you to turn to the first page or actually it's Page 2 of 8. Actually, let's flip to the next page, 3 of 8, and this document shows beginning cash of \$12,394.56. Do you see that? MR. MARIANI: It's before the witness. BY MR. LANDAU: Q. Okay. My question to you is: Where did that what are the sources of that money? A. On advice of counsel, I'm exercising my	2 3 4 5 6 7 8 9 10 11 12	correct? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And, Ms. Matthews, the costs to maintain a home of that stature are quite expensive; isn't that correct? MR. SALAZAR: Same objection, relevancy. THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. BY MR. LANDAU:
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Page 205 Page 207 BY MR. LANDAU: THE WITNESS: On advice of counsel, I'm 1 1 2 Q. So you're going to refuse to answer any 2 exercising my rights under the Fifth Amendment and decline to answer the question. question regarding your or your husband's monthly living 3 4 expenses; is that correct? 4 MR. LANDAU: Let's mark that as 17. 5 5 A. On advice of counsel, I'm exercising my (Thereupon, Exhibit Number 17 was marked for 6 rights under the Fifth Amendment and decline to answer the 6 Identification.) 7 7 BY MR. LANDAU: question. 8 MR. SALAZAR: Objection, relevancy. 8 Q. Ms. Matthews, the document that I put in 9 front of you labelled Exhibit 17 is the first amended 9 BY MR. LANDAU: Q. If these same questions were asked by the 10 Chapter 11 plan of reorganization of Robert Matthews. 10 11 bankruptcy judge in your husband's bankruptcy case, would 11 This is the Chapter 11 plan that has been filed in your you be providing the exact same answer you're providing me 12 12 husband's bankruptcy case. 13 here today? 13 Are you familiar with this document? 14 MR. SALAZAR: Objection, form and relevance. 14 A. On advice of counsel, I am exercising my MR. MARIANI: I'll object to the form, as 15 rights under the Fifth Amendment and decline to answer the 15 well. 16 auestion. 16 BY MR. LANDAU: 17 17 MR. SALAZAR: Objection on relevancy. 18 Q. You can answer. 18 BY MR. LANDAU: A. Oh. On advice of counsel, I'm exercising my Q. Has Mr. Matthews reviewed with you the terms 19 19 rights under the Fifth Amendment and decline to answer the 20 of this plan of reorganization? 20 21 question. 21 A. On advice of counsel, I'm exercising my 22 Q. Ms. Matthews, I'd ask you to flip to Page 6 22 rights under the Fifth Amendment and decline to answer the 23 23 of 8. Are you there? question. MR. MARIANI: The page is before the 24 O. So isn't it true that Mr. Matthews has, in 24 25 25 fact, reviewed with you this document? witness. Page 206 Page 208 BY MR. LANDAU: 1 A. On advice of counsel, I'm exercising my 1 2 Q. And I'd direct your attention to where it 2 rights under the Fifth Amendment and decline to answer the says date of check, October 1st, Top Nails, and it says 3 3 question. purpose or description, nails. It's hard to read the 4 Q. Isn't it true, Ms. Matthews, that number, \$86, \$86.22, or no, no, no, \$44. 5 5 Mr. Matthews has indicated to you that he has no intention of pursuing any litigation against you in the Bankruptcy 6 Do you see that, Ms. Matthews? 6 Court with regard to his plan of reorganization? 7 MR. MARIANI: Check at Item 10/1? 7 8 MR. LANDAU: I believe it's \$44. 8 MR. SALAZAR: Objection, relevancy. 9 MR. MARIANI: Date of check, 10/1? 9 THE WITNESS: On advice of counsel, I'm 10 exercising my rights under the Fifth Amendment and decline 10 MR. LANDAU: Yes. to answer the question. 11 MR. MARIANI: I've pointed that out to the 11 12 witness. 12 BY MR. LANDAU: 13 BY MR. LANDAU: 13 Q. Any causes of action that he may have or his 14 Q. Ms. Matthews, isn't it true that that's 14 bankruptcy estate may have against you, he has indicated money spent for you getting your nails done; correct? to you that he has no intention of pursuing; isn't that 15 15 MR. SALAZAR: Objection to relevancy. 16 16 correct? 17 THE WITNESS: On advice of counsel, I'm 17 MR. SALAZAR: Same objection. exercising my rights under the Fifth Amendment and decline 18 THE WITNESS: On advice of counsel, I'm 18 exercising my rights under the Fifth Amendment and decline to answer the question. 19 19 20 BY MR. LANDAU: 20 to answer the question. 21 BY MR. LANDAU: 21 Q. October 18th, Lodus, haircut, \$55. Isn't it 22 true that that expense is related to your getting a 22 Q. Isn't it true that all -- any and all 23 23 haircut? financial projections in this document are false? MR. SALAZAR: Objection, it's completely MR. SALAZAR: Same objection. 24 24 25 THE WITNESS: On advice of counsel, I'm 25 irrelevant to our case.

	Page 209		Page 211
1	exercising my rights under the Fifth Amendment and decline	1	A. Yes.
2	to answer the question.	2	Q. Now, earlier Mr. Landau showed you
3	BY MR. LANDAU:	3	Exhibit 9, which was a copy of a brochure that had your
4	Q. Isn't it true that Mr. Matthews would have	4	picture in it, do you recall him doing that?
5	no means of implementing this plan of reorganization?	5	A. On advice of counsel, I'm exercising my
6	MR. SALAZAR: Same objection.	6	rights under the Fifth Amendment and decline to answer the
7	THE WITNESS: On advice of counsel, I'm	7	question.
8	exercising my rights under the Fifth Amendment and decline	8	Q. Isn't it true that this brochure held you
9	to answer the question.	9	out as being a principal of the Palm House Hotel?
10	BY MR. LANDAU:	10	A. On advice of counsel, I'm exercising my
11	Q. Isn't it true, Ms. Matthews, that the	11	rights under the Fifth Amendment and decline to answer the
12	treatment provided to the EB-5 investors under this plan	12	question.
13	is completely illusory?	13	Q. And, in fact, you allowed yourself to be
14	A. On advice of counsel, I'm	14	held out to the public as a principal of the Palm House
15	MR. SALAZAR: Objection to form and	15	Hotel, didn't you?
16	THE WITNESS: exercising my rights under	16	A. On advice of counsel, I'm exercising my
17	the Fifth Amendment and decline to answer the question.	17	rights under the Fifth Amendment and decline to answer the
18	MR. SALAZAR: Objection to form and	18	question.
19	relevance.	19	Q. And you knew that this brochure was going to
20	BY MR. LANDAU:	20	be used by the Palm House Hotel to help raise money from
21 22	Q. Ms. Matthews, if called to testify in support of this plan of reorganization, will you be	21 22	EB-5 investors, didn't you? MR. SALAZAR: Objection, relevancy.
23	asserting your Fifth Amendment privileges?	23	THE WITNESS: On advice of counsel, I'm
24	MR. SALAZAR: Same objections.	24	exercising my rights under the Fifth Amendment and decline
25	THE WITNESS: On the advice of counsel, I'm	25	to answer the question.
	THE WITHESS. On the advice of counsel, I'm		to answer the question.
	Page 210		Page 212
1	exercising my rights under the Fifth Amendment and decline		BY MR. GEORGE:
2	exercising my rights under the Fifth Amendment and decline to answer the question.	2	BY MR. GEORGE: Q. And, in fact, this brochure was utilized to
2 3	exercising my rights under the Fifth Amendment and decline to answer the question. MR. LANDAU: Let's take can we take a	2 3	BY MR. GEORGE: Q. And, in fact, this brochure was utilized to raise funds from EB-5 investors in connection with the
2 3 4	exercising my rights under the Fifth Amendment and decline to answer the question. MR. LANDAU: Let's take can we take a MR. SALAZAR: Two-hour break?	2 3 4	BY MR. GEORGE: Q. And, in fact, this brochure was utilized to raise funds from EB-5 investors in connection with the Palm House project, wasn't it?
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Page 213 Page 215 know when you're ready for me to ask you questions about Q. And as we discussed earlier, you allowed 1 2 yourself to be held out to the public as a principal of that. 3 3 MR. MARIANI: It's before the witness. the Palm House Hotel? 4 4 A. On advice of counsel, I'm exercising my BY MR. GEORGE: 5 Q. Ms. Matthews, do you see where Paragraph C 5 rights under the Fifth Amendment and decline to answer the 6 says the bad actors materially, indeed, crucially 6 question. 7 represented, among other things, that, and then it has a 7 Q. And, in fact, that statement that's listed 8 list of subparagraphs? 8 in C-I, that there was a hundred percent guarantee for the 9 return of plaintiffs' investment and fees in the event Do you see that before you? 9 MR. MARIANI: That's before the witness. 10 their I-5 26 petitions were denied, is a falsehood? 10 11 BY MR. GEORGE: 11 MR. SALAZAR: Objection to form. 12 O. Now, isn't it true that the -- there were 12 BY MR. GEORGE: representations made to the EB-5 investors that there 13 Q. Isn't that right? 13 would be a 100 percent guarantee for the return of their 14 A. On advice of counsel, I am exercising my 14 investment and fees in the event their I-5 26 petitions 15 rights under the Fifth Amendment and decline to answer the 15 were denied with respect to the Palm House Hotel? 16 auestion. 16 17 MR. SALAZAR: Objection to form and 17 Q. Isn't it true that that was a lie that was 18 relevance. 18 told to the EB-5 investors by the principals of the 19 Palm House Hotel project? 19 THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline 20 MR. SALAZAR: Objection to form. 20 21 to answer the question. 21 THE WITNESS: On the advice of counsel, I'm 22 MR. GEORGE: Luis, I'm going to ask you 22 exercising my rights under the Fifth Amendment and decline respectfully to limit your objections to objections to to answer the question. 23 23 form, which as I'm sure you know, are the only proper 24 BY MR. GEORGE: 24 25 objections ---25 Q. Directing you to Paragraph C-II, it says Page 214 Page 216 100 percent of plaintiffs' funds would be held in escrow 1 MR. SALAZAR: Relevance -- relevancy ---1 2 MR. GEORGE: Excuse me, let me finish 2 until their Form I-5 26 immigration petitions were 3 3 talking, please. approved by USCIS. 4 MR. SALAZAR: Sure. 4 Isn't it true that was an additional MR. GEORGE: Your relevance objections are 5 5 representation that was made to the EB-5 investors in preserved for trial, as you know, and I'm going to ask you 6 order to induce them to invest in the Palm House Hotel 6 to limit your objections to proper deposition objections. 7 7 project? 8 MR. SALAZAR: I think relevance is proper. 8 MR. SALAZAR: Objection to form. 9 So you're saying you'll preserve -- you're stipulating 9 THE WITNESS: On advice of counsel, I'm that I am objecting to the relevance of every question? 10 exercising my rights under the Fifth Amendment and decline 10 MR. GEORGE: If you would like, sure. to answer the question. 11 11 12 MR. SALAZAR: Okay. Deal. 12 BY MR. GEORGE: 13 BY MR. GEORGE: 13 Q. And, in fact, that representation was made 14 by the principals of the Palm House Hotel, wasn't it? 14 Q. Mrs. Matthews, isn't it true that the Palm House Hotel project was seeking to raise money A. On advice of counsel, I'm exercising my 15 15 through EB-5 investors? rights under the Fifth Amendment and decline to answer the 16 16 17 A. On advice of counsel, I'm exercising my 17 question. rights under the Fifth Amendment and decline to answer the 18 MR. SALAZAR: Objection to form. 18 question. 19 BY MR. GEORGE: 19 20 O. And isn't it true that you knew that to be 20 O. And, in fact, that statement is also a lie, the case at all times since your husband regained 21 21 isn't it? 22 ownership of the Palm House Hotel property? 22 A. On advice of counsel, I'm exercising my 23 23 A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the 24 rights under the Fifth Amendment and decline to answer the 24 question. question. 25 O. Isn't it true that there wasn't even an

Page 217 Page 219 escrow account created in connection with the EB-5 to finish the renovation and development, which was near 2 investors' money? 2 completion. 3 A. On advice of counsel, I'm exercising my 3 Isn't it true that that representation was 4 rights under the Fifth Amendment and decline to answer the 4 made to potential EB-5 investors in the Palm House Hotel 5 auestion. 5 project in order to induce them to invest? 6 Q. And isn't it a fact that not one single EB-5 6 A. On advice of counsel, I'm exercising my investor had their I-5 26 petition approved in connection 7 rights under the Fifth Amendment and decline to answer the 7 8 with the Palm House Hotel project? 8 question. A. On advice of counsel, I'm exercising my 9 9 Q. And isn't it true that that representation rights under the Fifth Amendment and decline to answer the 10 was a lie when that was made to the EB-5 investors to 10 question. 11 11 induce them to invest? 12 MR. SALAZAR: Would you hold on for a 12 A. On advice of counsel, I'm exercising my 13 rights under the Fifth Amendment and decline to answer the 13 second, David? 14 question. 14 Go ahead. I'm sorry. MR. GEORGE: That's okay. May I continue? 15 15 Q. And isn't it true that, in fact, the EB-5 MR. SALAZAR: Yes, please. 16 investors' funds that were invested, were not exclusively 16 17 BY MR. GEORGE: 17 invested in the Palm House Hotel to help create jobs by 18 Q. Okay. Directing you to Paragraph C-III, 18 helping to finish the renovation and development, which which says, a limited number of 79 equity interests would was near completion? 19 19 be sold in Palm House Hotel, LLP, at the price of \$500,000 20 A. On advice of counsel, I'm exercising my 20 21 each plus 40 to \$60,000 in administrative fees. 21 rights under the Fifth Amendment and decline to answer the 22 Isn't it true that that representation was 22 question. made to potential EB-5 investors by the principals of the 23 Q. That didn't happen, in part, because you 23 24 took the EB-5 investment money for your own personal use, Palm House Hotel project? 24 25 MR. SALAZAR: Objection to form. 25 didn't you? Page 218 Page 220 THE WITNESS: On advice of counsel, I'm 1 1 A. On advice of counsel, I'm exercising my exercising my rights under the Fifth Amendment and decline 2 rights under the Fifth Amendment and decline to answer the 3 to answer the question. 3 question. BY MR. GEORGE: 4 Q. And, in fact, you and your husband conspired 4 5 Q. And that representation is a lie, as well, 5 to take that money for your own personal use, didn't you? A. On advice of counsel, I'm exercising my 6 isn't it? 6 rights under the Fifth Amendment and decline to answer the 7 A. On advice of counsel, I'm exercising my 7 8 rights under the Fifth Amendment and decline to answer the 8 question. 9 9 question. Q. The two of you figured out a way to use the Q. And, in fact, there were somewhere between 10 money to buy a yacht; right? 10 A. On advice of counsel, I'm exercising my 88 and 90 equity interests sold to EB-5 investors in 11 11 12 connection with the Palm House Hotel property, wasn't 12 rights under the Fifth Amendment and decline to answer the 13 there? 13 auestion. 14 14 Q. And you also used my clients' EB-5 A. On advice of counsel, I'm exercising my 15

rights under the Fifth Amendment and decline to answer the 15 16 question.

Q. And, in fact, you diverted millions of dollars of the proceeds of those sales for your own personal use, didn't you?

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- 19 A. On advice of counsel, I'm exercising my 20 rights under the Fifth Amendment and decline to answer the 21 22 question.
- 23 Q. Direct your -- I direct you to Paragraph C-IV, which says plaintiffs' funds would be exclusively 24
- invested in the Palm House Hotel to create jobs by helping

investment monies to pay off personal mortgages on your home at Casa Bendita, didn't you?

A. On advice of counsel, I am exercising my rights under the Fifth Amendment and decline to answer the question.

Q. And you also diverted money so that you could drive fancy cars, didn't you?

A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.

Q. And you used that money to have really

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Page 221 Page 223 expensive dinners at Mar-a-Lago, didn't you? MR. SALAZAR: Objection to form. 1 MR. SALAZAR: Objection to form. THE WITNESS: On advice of counsel, I'm 2 2 3 THE WITNESS: On advice of counsel, I'm 3 exercising my rights under the Fifth Amendment and decline 4 exercising my rights under the Fifth Amendment and decline to answer the question. 4 5 to answer the question. 5 BY MR. GEORGE: 6 BY MR. GEORGE: 6 Q. And that was a lie when it was told to the 7 Q. You were a member at Mar-a-Lago, weren't 7 EB-5 investors in order to get them to invest, wasn't it? 8 you? 8 A. On advice of counsel, I'm exercising my 9 A. On advice of counsel, I'm exercising my 9 rights under the Fifth Amendment and decline to answer the rights under the Fifth Amendment and decline to answer the 10 10 question. 11 question. 11 Q. And, in fact, one of the reasons why the EB-5 investors I-5 26 petitions were denied, is because 12 Q. I direct you to Paragraph C-V, it says the 12 the USCIS found that these job creation estimates were 13 Palm House Hotel will be open for business, by the quote, 13 unquote, "season" of 2013/2014, and was 80 to 90 percent 14 fraudulent, isn't that true? 14 15 15 completed prior to plaintiffs' investments. A. On advice of counsel, I'm exercising my 16 Isn't it true that the principals of 16 rights under the Fifth Amendment and decline to answer the 17 Palm House Hotel made those representations to potential 17 question. 18 EB-5 investors in order to induce them to invest in the 18 Q. Let me point out to you Paragraph C-VIII. Do you see there where it says, plaintiffs' funds would be 19 project? 19 20 20 the third and final source of funds? The EB-5 funds were MR. SALAZAR: Objection to form. 21 THE WITNESS: On advice of counsel, I'm 21 in addition to an equity investment by the developer in 22 exercising my rights under the Fifth Amendment and decline 22 excess of \$22 million in a bank loan by a bank that had to answer the question. 23 23 done full due diligence justifying such a loan in excess BY MR. GEORGE: 24 of \$29 million. Accordingly, plaintiffs' funds 24 25 O. In fact, that was a lie at the time it was 25 constituted less than 50 percent of the project funding. Page 222 Page 224 told to the EB-5 investors, wasn't it? 1 Isn't it true that the principals of the 1 2 MR. SALAZAR: Same objection. 2 Palm House Hotel made those representations to EB-5 3 3 THE WITNESS: On advice of counsel, I am investors in order to induce them to invest? exercising my rights under the Fifth Amendment and decline 4 MR. SALAZAR: Objection to form. 4 5 to answer the question. 5 MR. MARIANI: Excuse me, that's Item C-VII, 6 BY MR. GEORGE: 6 not C-VIII. is that the one? 7 Q. And, in fact, the Palm House Hotel did not 7 MR. GEORGE: Thank you for -- thank you for 8 open for business by the 2000/2014 -- I'm sorry, 2013/2014 8 correcting me. 9 9 season, did it? MR. SALAZAR: Objection to form. 10 10 A. On advice of counsel, I'm exercising my THE WITNESS: On advice of counsel, I'm rights under the Fifth Amendment and decline to answer the exercising my rights under the Fifth Amendment and decline 11 11 12 question. 12 to answer the question. 13 Q. Are you familiar with what plans for 13 BY MR. GEORGE: construction at the Palm House Hotel were approved by the 14 14 Q. Isn't it true that that statement, when it Town of Palm Beach? 15 15 was made to the investors, was a lie? 16 A. On advice of counsel, I'm exercising my 16 A. On advice of counsel, I'm exercising my 17 rights under the Fifth Amendment and decline to answer the 17 rights under the Fifth Amendment and decline to answer the question. 18 18 19 Q. Direct you to Paragraph C-VI, it says the 19 Q. Isn't it true that the developer referred to 20 funds will create 930 jobs, more than the required 790 20 in that paragraph is your husband, Robert Matthews? 21 full-time jobs for the offering. 21 A. On advice of counsel, I'm exercising my 22 Isn't it true that representations were made 22 rights under the Fifth Amendment and decline to answer the 23 to the EB-5 investors regarding the number of jobs that 23 question. would be created in this project in order to induce them Q. Is your husband, Robert Matthews, the 24 24 25 to invest? developer of the Palm House Hotel project?

Page 225 Page 227 A. On advice of counsel, I'm exercising my 1 1 question. rights under the Fifth Amendment and decline to answer the 2 Q. And as we sit here today, your husband, 3 question. 3 Robert Matthews, doesn't have any equity in the Palm House 4 4 Hotel project, does he? Q. Isn't it true, Mrs. Matthews, that your 5 husband, Robert Matthews, has been the developer of the 5 A. On advice of counsel, I'm exercising my 6 hotel project continuously since 2006? 6 rights under the Fifth Amendment and decline to answer the 7 A. On advice of counsel, I'm exercising my 7 auestion. rights under the Fifth Amendment and decline to answer the 8 8 Q. That was a lie that was told by, among 9 question. 9 others, your husband and Joseph Walsh in order to get 10 investors in the Palm House Hotel property to invest; 10 O. Isn't it true, Mrs. Matthews, that even 11 after he supposedly lost the hotel through a foreclosure 11 isn't that true? sale in 2009, that he continued to be the developer of the 12 A. On advice of counsel, I'm exercising my 13 hotel project? 13 rights under the Fifth Amendment and decline to answer the 14 A. On advice of counsel, I'm exercising my 14 question. rights under the Fifth Amendment and decline to answer the 15 15 Q. And isn't it true that Mr. Straub knew that auestion. 16 the Palm House Hotel project was being financed by EB-5 16 17 Q. Isn't it true that when Mr. Straub bought 17 investors? the hotel for \$10 million out of foreclosure, that he did 18 A. On advice of counsel, I'm exercising my 18 so as a favor to your husband, Robert Matthews? rights under the Fifth Amendment and decline to answer the 19 20 MR. SALAZAR: Objection to form. 20 auestion. 21 THE WITNESS: On advice of counsel, I'm 21 MR. SALAZAR: I'll object to the form of 22 exercising my rights under the Fifth Amendment and decline 22 that question. to answer the question. 23 23 BY MR. GEORGE: 24 BY MR. GEORGE: O. Were you ever in the presence of your 24 25 Q. Isn't it true that Mr. Straub bought the 25 husband and Mr. Straub when they discussed who was Page 226 Page 228 Palm House Hotel out of foreclosure sale for \$10 million? 1 financing the Palm House Hotel property? 1 2 A. On advice of counsel, I'm exercising my 2 A. On advice of counsel, I'm exercising my 3 rights under the Fifth Amendment and decline to answer the 3 rights under the Fifth Amendment and decline to answer 4 that question. 4 question. Q. Isn't it true that after Mr. Straub bought 5 5 Q. Were you ever in the presence of your husband and Mr. Straub when they discussed that EB-5 6 the hotel in a foreclosure sale, he allowed your husband 6 7 to continue to control the property? 7 investors were financing the construction of the 8 A. On advice ---8 Palm House Hotel property? 9 MR. SALAZAR: Objection to form. Pardon me. 9 MR. SALAZAR: Objection to form. THE WITNESS: On advice of counsel. I'm 10 10 THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline exercising my rights under the Fifth Amendment and decline 11 11 12 to answer the question. 12 to answer the question. 13 BY MR. GEORGE: 13 BY MR. GEORGE: 14 14 Q. Now, in that paragraph it says that there Q. Now, in fact, at the time the EB-5 investors were told that your husband, Robert Matthews, had was a \$29 million bank loan on the Palm House Hotel 15 15 \$22 million in equity in the Palm House Hotel project, property. That's an untrue statement, isn't it? 16 17 that was not a true statement, was it? 17 A. On advice of counsel, I'm exercising my A. On advice of counsel, I'm exercising my 18 rights under the Fifth Amendment and decline to answer the 18 19 rights under the Fifth Amendment and decline to answer the 19 question. 20 question. 20 O. Isn't it true, Mrs. Matthews, that there's 21 Q. As of August 30, 2013, your husband, 21 never been a \$29 million bank loan on the Palm House Hotel Robert Matthews, didn't have any equity in the Palm House 22 22 property? 23 Hotel property, did he? 23 A. On advice --A. On advice of counsel, I'm exercising my MR. SALAZAR: Objection to form. 24 24 25 25 rights under the Fifth Amendment and decline to answer the THE WITNESS: -- of counsel, I am exercising

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my rights under the Fifth Amendment and decline to answer 2 the question.

3 BY MR. GEORGE:

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Q. I'm going to refer you to Paragraph C-VIII, which says plaintiffs' funds would be held in escrow and were not yet needed because the developer's investment in excess of \$22 million and a bank loan in excess of \$29 million was being used for construction and renovation.

Isn't it true that that representation was made to EB-5 investors in order to induce them to invest in the Palm House Hotel property?

A. On advice --

MR. SALAZAR: Objection to form.

THE WITNESS: -- of counsel, I'm exercising 15 my rights under the Fifth Amendment and decline to answer 16 17 the question.

18 BY MR. GEORGE:

19 O. Isn't it true that that was a lie that was told to the EB-5 investors in order to get them to invest? 20

MR. SALAZAR: Objection to form.

22 THE WITNESS: On advice of counsel, I'm

exercising my rights under the Fifth Amendment and decline 23

to answer the question. 24

BY MR. GEORGE: 25

didn't you? 1

- 2 A. On advice of counsel, I'm exercising my 3 rights under the Fifth Amendment and decline to answer the 4 question.
 - Q. And don't you have personal knowledge of the fact that your husband reviewed and edited marketing materials with respect to the Palm House Hotel property before they were disseminated to potential investors?
 - A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.
 - Q. I direct you to Paragraph C-IX, which says plaintiffs' funds would not be taken from the escrow account and would not be used unless and until the developer's investment in excess of \$22 million, and the bank funds in excess of \$29 million had been used -- had been used at the project.

Isn't it true that those representations were made to the EB-5 investors in order to induce them to invest in the Palm House Hotel project?

MR. SALAZAR: Same objection.

22 THE WITNESS: On advice of counsel, I'm 23

exercising my rights under the Fifth Amendment and decline to answer the question.

24 BY MR. GEORGE: 25

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- Q. And that was a false statement when it was made to the EB-5 investors, wasn't it?
- A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.
- Q. And you, in fact, saw marketing materials that were distributed to the EB-5 investors that contained all of the statements we've discussed so far, haven't you?
- A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the auestion.
- Q. So you have personal knowledge of the fact that these misrepresentations were made to EB-5 investors in order to get them to invest, don't you?
- A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.
- Q. In fact, you've discussed the marketing materials with respect to the Palm House Hotel project with your husband, haven't you?
- A. On advice of counsel, I'm exercising my 21 22 rights under the Fifth Amendment and decline to answer the 22 23 question.
- 24 Q. And you did that prior to the time those marketing materials were disseminated to EB-5 investors,

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- Q. Now, when those payments were made to the EB-5 investors, they were false, weren't they?
- A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.
- Q. Because, in fact, at the time that statement was made, there was no developer investment of \$22 million in the Palm House property, was there?
- A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.

MR. SALAZAR: Object to the form of that last question.

BY MR. GEORGE:

- Q. So there was no \$22 million that could be spent ahead of the EB-5 investment monies, was there?
- A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.
- O. And at the time those statements were made to the EB-5 investors in order to induce them to invest, there was no \$29 million bank loan, was there?

MR. SALAZAR: Objection to form.

THE WITNESS: On advice of counsel, I'm

exercising my rights under the Fifth Amendment and decline

Page 233 Page 235 to answer the question. materials for Palm House -- for the Palm House project 2 BY MR. GEORGE: with Mr. Straub? 3 Q. So there was no \$29 million to be spent 3 A. On advice of counsel, I'm exercising my 4 ahead of the EB-5 investors' investment monies, were 4 rights under the Fifth Amendment and decline to answer the 5 there? 5 auestion. 6 A. On advice of counsel, I'm exercising my 6 Q. I'm going to refer you to Paragraph C-X, 7 rights under the Fifth Amendment and decline to answer the 7 which says the real property at issue was currently worth 8 question. 8 110 million to 137 million, in parentheses, (the current 9 O. So isn't it true that the intention at the 9 value representation varied depending on what the bad 10 actors believed a particular plaintiff wanted to hear), 10 time these statements were made, was that the EB-5 11 investors' money would be invested and immediately used by 11 closed parentheses, before completion, which made the 12 you and your husband and others, rather than being investment, quote, "one of the safest EB-5 offerings from invested in the Palm House Hotel property? 13 a job creation and investment position." 13 14 MR. SALAZAR: Objection to form. 14 Isn't it true that those representations 15 THE WITNESS: On advice of counsel, I'm 15 were made to potential EB-5 investors in order to induce exercising my rights under the Fifth Amendment and decline them to invest in the Palm House Hotel project? 16 16 17 to answer the question. 17 MR. SALAZAR: Objection to form. BY MR. GEORGE: 18 THE WITNESS: On advice of counsel, I'm 18 19 O. Well, other than the EB-5 investment monies. 19 exercising my rights under the Fifth Amendment and decline 20 to answer the question. what monies existed to renovate the hotel? 20 21 A. On advice of counsel, I'm exercising my 21 BY MR. GEORGE: 22 rights under the Fifth Amendment and decline to answer the 22 Q. And those representations were false when 23 they were made, weren't they? 23 question. 24 O. Isn't it true that at the time these A. On the advice of counsel, I am exercising my 24 25 statements were made, 160 Royal Palm, LLC had no capital 25 rights under the Fifth Amendment and decline to answer the Page 234 Page 236 within -- with which to use to continue construction of 1 auestion. 1 2 2 the project? Q. And isn't it true that the Palm House Hotel 3 MR. SALAZAR: Objection to form. 3 property was not worth \$110 million at the time those THE WITNESS: On advice of counsel, I'm 4 statements were disseminated to EB-5 investors? 4 exercising my rights under the Fifth Amendment and decline 5 A. On advice of counsel, I am exercising my 6 to answer the question. 6 rights under the Fifth Amendment and decline to answer the 7 7 BY MR. GEORGE: question. 8 Q. Did 160, LLC -- 160 -- sorry. For purposes 8 O. And isn't it true that the Palm House Hotel 9 of brevity, is it okay if I refer to 160 Royal --9 property was not worth between 110 million and 137 million 160 Royal Palm, LLC as 160 --10 10 at the time these statements were made? MR. SALAZAR: Yes, that's fine by me. A. On advice of counsel, I am exercising my 11 11 12 MR. GEORGE: -- just for purposes of 12 rights under the Fifth Amendment and decline to answer the 13 brevity? 13 auestion. 14 MR. MARIANI: Yeah, we can do that. 14 Q. And, in fact, isn't it true that the MR. GEORGE: Okay. Thank you. Palm House Hotel property was nowhere near that amount of 15 15 16 BY MR. GEORGE: 16 money when the EB-5 investors were being told that it was? 17 Q. What other monies did 160 have at the time 17 A. On advice -these representations were made to the EB-5 investors? 18 MR. SALAZAR: Objection to form. 18 19 A. On advice of counsel, I am exercising my 19 THE WITNESS: -- of counsel, I am exercising 20 rights under the Fifth Amendment and decline to answer the 20 my rights under the Fifth Amendment and decline to answer. BY MR. GEORGE: 21 question. 21 22 MR. SALAZAR: I object to the form of that 22 Q. Have you seen a current appraisal with 23 23 respect to the value of the Palm House Hotel property? question. A. On the advice of counsel, I'm exercising my 24 BY MR. GEORGE: 24 25 Q. Did you ever review any of the marketing 25 rights under the Fifth Amendment and decline to answer the

Page 237 Page 239 question. potential EB-5 investors; isn't that true? 1 1 2 Q. Let me refer you to Paragraph C-Roman 2 A. On advice of counsel, I'm exercising my Numeral -- I think there's a typo. If you go to the top 3 rights under the Fifth Amendment and decline to answer the of Page 8 of Exhibit 18, there is a Paragraph VII, and it 4 4 question. says -- it's a typo, the paragraphs are misnumbered, but 5 Q. There was never such a policy in connection 6 it says, I-5 26 immigration petitions for the Palm House 6 with the Palm House Hotel project, was there? Hotel project had already been approved by USCIS for the 7 A. On advice of counsel, I'm exercising my 8 initial investors. Do you see that statement? 8 rights under the Fifth Amendment and decline to answer the MR. MARIANI: It's before the witness. 9 9 question. 10 10 Q. The next paragraph, which is misnumbered IX, BY MR. GEORGE: 11 Q. Now, isn't it true that that representation 11 says the local government guaranteed that construction of 12 was made to potential EB-5 investors in order to get them the Palm House Hotel project would be completed and that to invest in the Palm House Hotel project? 13 this would be the last five star hotel property they would 13 14 MR. SALAZAR: Objection to form. 14 allow on Palm Beach. 15 THE WITNESS: On advice of counsel, I'm 15 Isn't it true that those representations exercising my rights under the Fifth Amendment and decline 16 were made to EB-5 investors, potential EB-5 investors, in 16 17 to answer the question. 17 order to induce them to invest in the Palm House Hotel 18 BY MR. GEORGE: 18 project? 19 19 O. Now, that statement was false when it was MR. SALAZAR: Same objection, form. 20 20 THE WITNESS: On advice of counsel, I'm made to potential EB-5 investors, wasn't it? 21 A. On advice of counsel, I'm exercising my 21 exercising my rights under the Fifth Amendment and decline 22 rights under the Fifth Amendment and decline to answer the 22 to answer the question. BY MR. GEORGE: 23 question. 23 24 O. In fact, at the time this information was 24 O. That statement -- those statements were 25 being disseminated to EB-5 investors, not a single I-5 26 25 false when they were made to the EB-5 investors, weren't Page 240 Page 238 petition had been approved for the Palm House Hotel, had 1 they? 1 2 it? 2 A. On advice of counsel, I'm exercising my 3 3 A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the rights under the Fifth Amendment and decline to answer the 4 4 question. question. 5 5 Q. The Town of Palm Beach never guaranteed the 6 Q. And, in fact, not a single I-5 26 petition 6 completion of the Palm House Hotel project, did they? was ever approved for any EB-5 investor in connection with 7 7 A. On advice of counsel, I'm exercising my 8 this project, was it? 8 rights under the Fifth Amendment and decline to answer the 9 9 A. On advice of counsel, I'm exercising my question. rights under the Fifth Amendment and decline to answer the 10 10 Q. In fact, isn't it true that the Town of Palm 11 question. 11 Beach was actually fining the developer for failing to 12 Q. I'm going to refer you to the next 12 complete the project? 13 subparagraph there, which says, an insurance policy was 13 MR. SALAZAR: Objection to form. 14 purchased by the developer that guaranteed the THE WITNESS: On advice of counsel, I am construction of the Palm House Hotel project would be exercising my rights under the Fifth Amendment and decline 15 15 to answer the question. 16 completed. 16 17 Isn't it true that that representation was 17 BY MR. GEORGE: 18 made to EB-5 investors in order to induce them to invest 18 Q. Next paragraph, which is misnumbered in the Palm House Hotel property? 19 Subparagraph X, says the developer, Robert Matthews, was a 19 20 20 MR. SALAZAR: Objection to form. famous real estate developer in the United States. 21 21 THE WITNESS: On advice of counsel, I'm Isn't it true that that statement was 22 exercising my rights under the Fifth Amendment and decline 22 made -- that representation was made to the EB-5 investors 23 to answer the question. 23 in order to induce them to invest in the Palm House Hotel BY MR. GEORGE: 24 24 property? 25 25 Q. That statement was a lie when it was made to A. On advice ---

Page 241 Page 243 MR. SALAZAR: Objection to form. Sorry. THE WITNESS: On advice of counsel, I'm 1 1 THE WITNESS: On advice of counsel, I am 2 exercising my rights under the Fifth Amendment and decline exercising my rights under the Fifth Amendment and decline 3 to answer the question. to answer the question. 4 BY MR. GEORGE: 5 5 BY MR. GEORGE: Q. How many times have you and your husband had 6 Q. And that statement was a lie when it was 6 Mr. Straub bail you out of dire financial circumstances? MR. SALAZAR: Objection to form. 7 made to the EB-5 investors in order to induce them to 7 THE WITNESS: On advice of counsel, I'm 8 invest, wasn't it? 8 9 A. On advice of counsel, I'm exercising my 9 exercising my rights under the Fifth Amendment and decline rights under the Fifth Amendment and decline to answer the to answer the question. 10 10 11 question. 11 BY MR. GEORGE: 12 O. In fact, at the time these statements were 12 Q. Next subparagraph, which is mislabelled XI, 13 made to the EB-5 investors, your husband, Mr. Matthews, 13 says each investor's investment will be fully secured by had essentially lost all of his real estate holdings, the real property at issue and by the State of Florida 14 pursuant to UCC Form. As there would be 79 rooms and 79 15 hadn't he? 15 16 A. On advice of counsel, I am exercising my 16 investors, each investor would be given a UCC security 17 rights under the Fifth Amendment and decline to answer 17 interest in an individual room. 18 that question. 18 Isn't it true that those statements were 19 Q. And, in fact, when these statements were 19 made to potential EB-5 investors in order to get them to made, he had already had to have turned to Mr. Straub to 20 invest in the -- in the Palm House Hotel project? 20 21 bail him out of several deals going bad, didn't he? 21 A. On advice of counsel, I'm exercising my 22 MR. SALAZAR: Objection to form. 22 rights under the Fifth Amendment and decline to answer the THE WITNESS: On advice of counsel, I am 23 23 question. exercising my rights under the Fifth Amendment and decline 24 O. And those statements were lies when they 24 25 to answer the question. were made to the EB-5 investors, weren't they? Page 242 Page 244 BY MR. GEORGE: 1 A. On advice of counsel, I'm exercising my 1 2 Q. In fact, in connection with your residence 2 rights under the Fifth Amendment and decline to answer the 3 in Nantucket, the 11 Cliff Road property, he asked 3 question. Mr. Straub to step in and help him shield himself from a Q. In fact, there were never UCC security 4 5 \$2 million judgment so his creditors couldn't get at that 5 interests given to any of the EB-5 investors in any of the rooms in the Palm House Hotel project, were there? 6 money, didn't he? 6 7 MR. SALAZAR: Objection to form. 7 A. On advice of counsel, I'm exercising my 8 THE WITNESS: On the advice of counsel, I am 8 rights under the Fifth Amendment and decline to answer the 9 exercising my rights under the Fifth Amendment and decline 9 question. 10 10 to answer the question. O. And, in fact, none of the EB-5 investors' BY MR. GEORGE: investments in the Palm House Hotel project were fully 11 11 12 Q. Your husband did have a \$2 million judgment 12 secured by the real property itself, were they? 13 entered against him in Nantucket, didn't he? 13 MR. SALAZAR: Objection to form. 14 14 A. On advice of counsel, I'm exercising my THE WITNESS: On advice of counsel, I'm rights under the Fifth Amendment and decline to answer the exercising my rights under the Fifth Amendment and decline 15 15 to answer the question. 16 question. 16 17 Q. And, in fact, that \$2 million judgment was 17 BY MR. GEORGE: with respect to the Point Breeze Hotel, another project 18 Q. Now, you knew that there was a mortgage on 18 that had gone bad, wasn't it? 19 the Palm House Hotel property as of the time that 19 20 A. On advice of counsel, I'm exercising my 20 Mr. Straub sold the property back to your husband, didn't rights under the Fifth Amendment and decline to answer the 21 21 you? 22 22 A. On advice of counsel, I'm exercising my question. 23 23 Q. And Mr. Straub helped your husband make sure rights under the Fifth Amendment and decline to answer the

Q. Was there a Palm -- was there an advisory

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question.

he never had to pay that judgment off, didn't he?

MR. SALAZAR: Objection to form.

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Page 245 Page 247 board for the Palm House Hotel at any point in time? Q. Isn't it true that Bill Clinton was never --1 1 2 A. On advice of counsel, I'm exercising my 2 never agreed to serve on the Palm House Hotel advisory rights under the Fifth Amendment and decline to answer the 3 board? 4 4 question. A. On advice of counsel, I'm exercising my 5 Q. Isn't it true that the EB-5 -- potential 5 rights under the Fifth Amendment and decline to answer the 6 EB-5 investors were told that Donald Trump would serve on 6 auestion. 7 the advisory board for the Palm House Hotel? 7 Q. Isn't it true that without permission, 8 MR. SALAZAR: Objection to form, you can 8 President Clinton's likeness was used in Palm House Hotel 9 answer. 9 marketing materials, and those materials were distributed 10 to potential EB-5 investors in order to trick them into 10 THE WITNESS: On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline 11 believing that he was associated with this project? 11 to answer the question. 12 12 A. On advice of counsel, I'm exercising my BY MR. GEORGE: 13 rights under the Fifth Amendment and decline to answer the 13 question. 14 Q. And that representation was absolutely false 14 15 when it was made to potential EB-5 investors, wasn't it? 15 O. Was there a hotel club that was associated A. On advice of counsel, I'm exercising my 16 with the Palm House Hotel? 16 A. On advice of counsel, I'm exercising my 17 rights under the Fifth Amendment and decline to answer the 17 18 question. rights under the Fifth Amendment and decline to answer the 18 19 19 Q. And, in fact, you and your husband took auestion. Chinese immigration agents to Mar-a-Lago in order to make 20 20 O. You need a break? A. I'm good. 21 it appear that Mr. Trump actually would be on the hotel 21 22 advisory board, didn't you? 22 MR. SALAZAR: Do you have much more? MR. SALAZAR: Objection to form. 23 MR. GEORGE: Probably 15, 20 minutes. 23 THE WITNESS: On advice of counsel, I'm 24 THE WITNESS: No, I'm fine. I just got a 24 25 exercising my rights under the Fifth Amendment and decline 25 little dry, my apologies. Page 246 Page 248 to answer the question. 1 1 MR. SALAZAR: I'm so sorry, I could use a BY MR. GEORGE: 2 2 break. 3 3 Q. And you even went so far as to stage MR. GEORGE: Do you want to take a few pictures with Mr. Trump in order to trick the immigration 4 4 minutes? 5 agents into believing he was part of this project, didn't 5 MR. SALAZAR: I just need to run to the 6 you? 6 bathroom. 7 MR. SALAZAR: Objection to form. 7 MR. LANDAU: I do, as well. 8 THE WITNESS: On advice of counsel, I'm 8 (Thereupon, a brief recess was taken, after exercising my rights under the Fifth Amendment and decline 9 which the following proceedings were had:) 9 10 10 to answer the question. BY MR. GEORGE: BY MR. GEORGE: 11 11 Q. Isn't it true that there were 12 Q. And, in fact, there were marketing materials 12 representations made to potential EB-5 investors that 13 distributed to potential EB-5 investors that had Mister --13 there would be an exclusive invitation only club at the President Trump's likeness in them, wasn't there? 14 Palm House Hotel? 14 A. On advice of counsel, I'm exercising my 15 15 A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the 16 rights under the Fifth Amendment and decline to answer the 16 17 question. 17 question. Q. And isn't it true that the Trump 18 Q. And isn't it true there were no memberships 18 organization sent a cease and desist letter ordering the 19 to that club ever sold because the hotel was never 19 20 Palm House Hotel and the various individuals associated 20 actually open for business? 21 with it to stop using his likeness and name in connection 21 A. On advice of counsel, I'm exercising my 22 with this project? 22 rights under the Fifth Amendment and decline to answer the A. On advice of counsel, I'm exercising my 23 23 question. rights under the Fifth Amendment and decline to answer the 24 24 Q. So isn't it true that in this paragraph 25 question. 25 where it says Tony Bennett was already a member of the

Page 249 Page 251 BY MR. GEORGE: 1 hotel club, that was a lie, wasn't it? 1 Q. Isn't it true that there was a seven-month 2 A. On advice of counsel, I'm exercising my 2 rights under the Fifth Amendment and decline to answer the gap between the closing of the sale of the Palm House 4 Hotel to your husband and the recording of the KK-PB auestion. 5 Q. Tony Bennett was never a member of any 5 mortgage in the public records of Palm Beach County, 6 exclusive club associated with the Palm House Hotel, was 6 Florida? 7 7 MR. SALAZAR: Objection to form. he? 8 8 A. On advice of counsel, I'm exercising my THE WITNESS: On advice of counsel, I'm rights under the Fifth Amendment and decline to answer the 9 9 exercising my rights under the Fifth Amendment and decline to answer the question. 10 question. 10 BY MR. GEORGE: 11 Q. Do either you or your husband even know 11 12 Tony Bennett? 12 O. Isn't it true that there were 13 representations made to potential EB-5 investors that 13 A. On advice of counsel, I'm exercising my rights under the Sixth -- Fifth Amendment and decline to they, in fact, would have a first lien on the Palm House 14 14 15 15 answer the question. Hotel property? Q. Isn't it true that Celine Dion was never a 16 16 A. On advice of counsel, I'm exercising my 17 member of any sort of exclusive club at the Palm House 17 rights under the Fifth Amendment and decline to answer the 18 Hotel? 18 auestion. 19 19 A. On advice of counsel, I'm exercising my Q. And isn't it true that those representations rights under the Fifth Amendment and decline to answer the 20 were false at the time they were made to potential EB-5 20 21 question. 21 investors? 22 Q. Do you or your husband even know 22 A. On advice of counsel, I'm exercising my 23 23 rights under the Fifth Amendment and decline to answer the Celine Dion? 24 A. On advice of counsel, I'm exercising my 24 question. 25 rights under the Fifth Amendment and decline to answer the 25 Q. Was it ever disclosed to potential EB-5 Page 250 Page 252 question. investors that their monies, in fact, would not be held in 1 2 Q. Did you ever talk to Mr. Straub about 2 an escrow account until their I-5 26 petitions were helping you recruit members for the exclusive club that 3 approved? potential EB-5 investors were told would exist at the A. On advice of counsel, I am exercising my 4 5 Palm House Hotel? 5 rights under the Fifth Amendment and decline to answer the 6 A. On advice of counsel, I'm exercising my 6 question. 7 rights under the Fifth Amendment and decline to answer the 7 Q. Isn't it true that the first three mortgage 8 question. 8 payments made by Palm House, LLC to KK-PB Financial were 9 made using EB-5 investors' money? Q. Was it ever disclosed to any of the 10 MR. SALAZAR: Objection to form. 10 potential EB-5 investors that there was a first mortgage THE WITNESS: On advice of counsel, I'm on the property in favor of KK-PB Financial, LLC? 11 11 12 A. On advice of counsel, I am exercising my 12 exercising my rights under the Fifth Amendment and decline 13 rights under the Fifth Amendment and decline to answer the 13 to answer the question. 14 BY MR. GEORGE: 14 question. O. Isn't it a fact that the existence of 15 O. Isn't it true that Palm House, LLC had no 15 16 KK-PB Financial, LLC's mortgage was concealed from 16 other source of funds to make mortgage payments, other 17 potential EB-5 investors through the time it was actually 17 than from EB-5 investors' money? recorded in the public records of Palm Beach County? 18 A. On advice of counsel, I'm exercising my 18 19 MR. SALAZAR: Sorry, could you repeat that 19 rights under the Fifth Amendment and decline to answer the 20 question? Sorry. 20 question. 21 Q. Isn't it true that Mr. Straub knew that Palm 21 (Thereupon, the pending question was read 22 back by the court reporter.) 22 House, LLC had no other source of funds to pay the KK-PB 23 THE WITNESS: On advice of counsel, I'm 23 mortgage, other than EB-5 investors' money? exercising my rights under the Fifth Amendment and decline 24 A. On advice of counsel, I'm exercising my 24 rights under the Fifth Amendment and decline to answer the to answer the question.

Page 253 Page 255 rights under the Fifth Amendment and decline to answer the 1 question. 1 2 MR. GEORGE: I'm sorry, let's go off the 2 auestion. record a minute. 3 O. Isn't it true that Mr. Straub does not have 4 4 a positive view of minorities? (Discussion off the record.) 5 MR. GEORGE: Back on the record, please. 5 MR. SALAZAR: Objection to form. 6 BY MR. GEORGE: 6 THE WITNESS: On advice of counsel, I'm 7 7 exercising my rights under the Fifth Amendment and decline Q. Mrs. Matthews, your counsel has put back in 8 front of you Exhibit Number 14, which are the text 8 to answer the question. messages that Mr. Landau discussed with you earlier. BY MR. GEORGE: 9 9 Would you please turn to Page MM13? Before 10 10 Q. When we were talking earlier about Mr. Straub's lawsuit against you, did you feel that what 11 I ask about any specific texts there, isn't it true that 11 you have discussed with Mr. Straub the fact that the EB-5 Mr. Straub was really trying to do was to teach you a 12 investors who invested in the Palm House Hotel property 13 lesson because he felt you had crossed him? 13 were -- were citizens of countries other than the 14 A. On advice of counsel, I'm exercising my 14 15 rights under the Fifth Amendment and decline to answer the 15 United States? 16 A. On advice of counsel, I'm exercising my 16 auestion. 17 rights under the Fifth Amendment and decline to answer the 17 Q. Mr. Straub feels that it's his duty to teach 18 question. 18 people lessons who don't do what he wants them to do, 19 doesn't he? 19 O. He knew that the investors were from China, 20 20 for example, didn't he? MR. SALAZAR: Objection to form. 21 A. On advice of counsel, I am exercising my 21 THE WITNESS: On advice of counsel, I am 22 rights under the Fifth Amendment and decline to answer the 22 exercising my rights under the Fifth Amendment and decline to answer the question. 23 question. 23 24 24 O. And he knew there were investors from Iran? BY MR. GEORGE: 25 A. On advice of counsel, I'm exercising my 25 Q. Did Mr. Straub tell you that he wanted to Page 254 Page 256 rights under the Fifth Amendment and decline to answer the teach the Chinese EB-5 investors a lesson? 1 1 2 2 A. On advice of counsel, I'm exercising my question. Q. And he knew there were investors from 3 3 rights under the Fifth Amendment and decline to answer the 4 4 Turkey? question. Q. Did he ever tell you he wanted to teach the 5 5 A. On advice of counsel, I am exercising my 6 rights under the Fifth Amendment and decline to answer the Iranian investors a lesson? 6 7 question. 7 A. On advice of counsel, I am exercising my 8 Q. Okay. At the top of Page MM13, do you see 8 rights under the Fifth Amendment and decline to answer the 9 there's a picture there that you had sent to Mr. Straub on 9 question. May 19, 2018 at 11:11 a.m.? Do you see that picture? 10 10 O. What about the Turkish investors? MR. MARIANI: That's before the witness. A. On advice of counsel, I am exercising my 11 11 12 BY MR. GEORGE: 12 rights under the Fifth Amendment and decline to answer the 13 Q. There's a text back from Mr. Straub at 13 auestion. 5/19/18 at 11:25 a.m., and it says in part, I felt like my 14 14 Q. Mr. Straub ever tell you that the EB-5 philosophy on minorities stinks. investors should have been smarter and it was their own 15 15 Did you discuss with him what he meant by fault that they were taken advantage of? 16 16 17 that statement? 17 A. On advice of counsel, I am exercising my MR. SALAZAR: Objection to form. 18 rights under the Fifth Amendment and decline to answer the 18 19 THE WITNESS: On advice of counsel, I'm 19 question. 20 exercising my rights under the Fifth Amendment and decline 20 O. When Mr. Straub bought the Palm House Hotel to answer the question. out of foreclosure, he did it as a favor to your husband; 21 21 22 BY MR. GEORGE: 22 right? 23 23 Q. Did you ever discuss Mr. Straub's views on MR. SALAZAR: Objection to form, asked and minorities with him? 24 24 answered. A. On advice of counsel, I'm exercising my 25 25 BY MR. GEORGE:

	Page 257		Page 259
1	Q. You can answer.	1	Exhibit 18 and Paragraph the same paragraph that
2	A. On advice of counsel, I am exercising my	2	Mr. George was asking you about, specifically, the
3	rights under the Fifth Amendment and decline to answer the	3	allegations at Paragraph 14C.
4	question.	4	Do you have it in front of you?
5	Q. Isn't it true that that whole transaction	5	MR. MARIANI: It's in front of the witness.
6	was a sham to allow your husband to stay in control of the	6	BY MR. LANDAU:
7	hotel and not lose it to creditors?	7	Q. Ms. Matthews, all the questions Mr. George
8	A. On advice of counsel, I'm exercising my	8	just went over regarding the representations made to the
9	rights under the Fifth Amendment and decline to answer the		EB-5 creditors, none of those representations are
10	question.	10	discussed in Mr. Matthews, your husband, Robert Matthews,
11	Q. Isn't it true that your husband and	11	plan of reorganization, are they?
12	Mr. Straub have a long history of protecting your	12	A. On advice of counsel, I'm exercising my
13	husband's asset from creditors together?	13 14	rights under the Fifth Amendment and decline to answer the
14 15	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the		question. Q. And don't you feel that those
16	question.	16	representations or misrepresentations would be material
17	Q. Isn't it true because of your intimate	17	statements that should be included in the plan of
18	personal relationship with Mr. Straub over the years, that	18	reorganization?
19	he was more than happy to help you and your husband keep	19	A. On advice of counsel, I'm exercising my
20	your assets out of the reach of creditors?	20	rights under the Fifth Amendment and decline to answer the
21	A. On advice of counsel, I am exercising my	21	question.
22	rights under the Fifth Sixth Fifth, excuse me,	22	Q. Because of the fact that your husband,
23	amendment and decline to answer the question.	23	Robert Matthews, got you into this mess with regard to the
24	Q. That's what he did with respect to	24	Palm House Hotel, you would have claims against your
25	11 Cliff Road; right?	25	husband, wouldn't you?
	Page 258		Page 260
1	Page 258 A On advice of counsel I'm exercising my	1	Page 260
1 2	A. On advice of counsel, I'm exercising my	1 2	A. On advice of counsel, I'm exercising my
2	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the	2	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the
	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.		A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.
2 3	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.	2 3	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. In fact, you would be a creditor of your
2 3 4	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did with your other	2 3 4	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.
2 3 4 5	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did with your other property in Nantucket; right? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the	2 3 4 5 6 7	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. In fact, you would be a creditor of your husband, Robert Matthew, wouldn't you? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the
2 3 4 5 6 7 8	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did with your other property in Nantucket; right? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.	2 3 4 5 6 7 8	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. In fact, you would be a creditor of your husband, Robert Matthew, wouldn't you? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question.
2 3 4 5 6 7 8 9	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did with your other property in Nantucket; right? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did in this case with	2 3 4 5 6 7 8 9	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. In fact, you would be a creditor of your husband, Robert Matthew, wouldn't you? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. LANDAU: No further questions.
2 3 4 5 6 7 8 9 10	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did with your other property in Nantucket; right? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did in this case with respect to 160, as well; right?	2 3 4 5 6 7 8 9 10	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. In fact, you would be a creditor of your husband, Robert Matthew, wouldn't you? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. LANDAU: No further questions. MR. MARIANI: Okay. Thank you. We'll read.
2 3 4 5 6 7 8 9 10 11	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did with your other property in Nantucket; right? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did in this case with respect to 160, as well; right? MR. SALAZAR: Objection to form.	2 3 4 5 6 7 8 9 10 11	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. In fact, you would be a creditor of your husband, Robert Matthew, wouldn't you? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. LANDAU: No further questions. MR. MARIANI: Okay. Thank you. We'll read. MR. SALAZAR: May I have a quick question,
2 3 4 5 6 7 8 9 10 11 12	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did with your other property in Nantucket; right? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did in this case with respect to 160, as well; right? MR. SALAZAR: Objection to form. THE WITNESS: On advice of counsel, I am	2 3 4 5 6 7 8 9 10 11 12	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. In fact, you would be a creditor of your husband, Robert Matthew, wouldn't you? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. LANDAU: No further questions. MR. MARIANI: Okay. Thank you. We'll read. MR. SALAZAR: May I have a quick question, just very short, very brief? Promise it will be brief,
2 3 4 5 6 7 8 9 10 11 12 13	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did with your other property in Nantucket; right? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did in this case with respect to 160, as well; right? MR. SALAZAR: Objection to form. THE WITNESS: On advice of counsel, I am exercising my rights under the Fifth Amendment and decline	2 3 4 5 6 7 8 9 10 11 12 13	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. In fact, you would be a creditor of your husband, Robert Matthew, wouldn't you? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. LANDAU: No further questions. MR. MARIANI: Okay. Thank you. We'll read. MR. SALAZAR: May I have a quick question, just very short, very brief? Promise it will be brief, promise.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did with your other property in Nantucket; right? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did in this case with respect to 160, as well; right? MR. SALAZAR: Objection to form. THE WITNESS: On advice of counsel, I am exercising my rights under the Fifth Amendment and decline to answer the question. MR. GEORGE: I have no further questions.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. In fact, you would be a creditor of your husband, Robert Matthew, wouldn't you? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. LANDAU: No further questions. MR. MARIANI: Okay. Thank you. We'll read. MR. SALAZAR: May I have a quick question, just very short, very brief? Promise it will be brief, promise. MR. MARIANI: Well, why didn't you go after David?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did with your other property in Nantucket; right? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did in this case with respect to 160, as well; right? MR. SALAZAR: Objection to form. THE WITNESS: On advice of counsel, I am exercising my rights under the Fifth Amendment and decline to answer the question. MR. GEORGE: I have no further questions. MR. LANDAU: I have one follow-up oh,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. In fact, you would be a creditor of your husband, Robert Matthew, wouldn't you? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. LANDAU: No further questions. MR. MARIANI: Okay. Thank you. We'll read. MR. SALAZAR: May I have a quick question, just very short, very brief? Promise it will be brief, promise. MR. MARIANI: Well, why didn't you go after David? MR. SALAZAR: Because he wanted to jump it.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did with your other property in Nantucket; right? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did in this case with respect to 160, as well; right? MR. SALAZAR: Objection to form. THE WITNESS: On advice of counsel, I am exercising my rights under the Fifth Amendment and decline to answer the question. MR. GEORGE: I have no further questions. MR. LANDAU: I have one follow-up oh, Lou, do you have any?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. In fact, you would be a creditor of your husband, Robert Matthew, wouldn't you? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. LANDAU: No further questions. MR. MARIANI: Okay. Thank you. We'll read. MR. SALAZAR: May I have a quick question, just very short, very brief? Promise it will be brief, promise. MR. MARIANI: Well, why didn't you go after David? MR. SALAZAR: Because he wanted to jump it. MR. LANDAU: Oh, I thought
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did with your other property in Nantucket; right? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. And that's what he did in this case with respect to 160, as well; right? MR. SALAZAR: Objection to form. THE WITNESS: On advice of counsel, I am exercising my rights under the Fifth Amendment and decline to answer the question. MR. GEORGE: I have no further questions. MR. LANDAU: I have one follow-up oh, Lou, do you have any? MR. SALAZAR: You can go ahead.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. Q. In fact, you would be a creditor of your husband, Robert Matthew, wouldn't you? A. On advice of counsel, I'm exercising my rights under the Fifth Amendment and decline to answer the question. MR. LANDAU: No further questions. MR. MARIANI: Okay. Thank you. We'll read. MR. SALAZAR: May I have a quick question, just very short, very brief? Promise it will be brief, promise. MR. MARIANI: Well, why didn't you go after David? MR. SALAZAR: Because he wanted to jump it. MR. LANDAU: Oh, I thought MR. MARIANI: You guys are all on the same
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		1	
	Page 261		Page 263
1	today. The one thing you've said over and over is that on	1	MR. MARIANI: We don't have to do that on
2	advice of counsel, you're pleading the Fifth Amendment;	2	the record.
3	correct?	3	MR. GEORGE: Objection, he's not being
4	MR. MARIANI: Objection, form.	4	deposed.
5	BY MR. SALAZAR:	5	MR. SALAZAR: I'd like to we can go off
6	Q. You can answer.	6	the record for a moment if you'd like.
7	A. On advice of counsel, I'm exercising my	7	(Discussion off the record.)
8	rights under the Fifth Amendment and decline to answer	8	MR. SALAZAR: Let's go back on the record,
9	that question.	9	then.
10	Q. And, in fact, no matter how false the	10	BY MR. SALAZAR:
11	premise of the questions asked of you today by co-counsel	11	Q. Is there any reason you would not be
12	here, you had to respond as directed by counsel. You	12	available to appear at trial on December 6th in this
13	responded as directed and advised by counsel; correct?	13	matter?
14	MR. GEORGE: Objection to form.	14	A. (The witness confers with counsel.) I'll
15	THE WITNESS: On advice of counsel, I'm	15	review that with my attorney.
16	exercising my rights under the Fifth Amendment and decline		Q. Do you have any plans to be out of the
17	to answer the question.	17	country on December 6th?
18	BY MR. SALAZAR:	18	MR. STRAUB: Are we back on the record?
19	Q. So really to any question that would have	19	MR. SALAZAR: We should be.
20	been asked of you today related to this matter, you would	20	MR. MARIANI: It's on the record, yes.
21	have followed your counsel's advice and answered as you've	21	No?
22	been answering; correct?	22	THE WITNESS: No.
23	MR. GEORGE: Objection to form.	23	MR. SALAZAR: No, she has no plans?
24	THE WITNESS: On advice of counsel, I'm	24	MR. MARIANI: No, we don't. No, we don't.
25	exercising my rights under the Fifth Amendment and decline		MR. SALAZAR: Okay. I have no additional
	Page 262		
	Page 262		Page 264
1		1	
1 2	to answer the question.	1 2	questions. Thank you.
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